

**Chief Executive's Report on
submissions received in respect of
the Draft County Donegal
Development Plan 2018-2024**

October 2017



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

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1 Introduction

1.1 Background

On 3rd June 2016, Donegal County Council gave notice of its intention to review the existing County Donegal Development Plan 2012- 2018 (as varied) and to prepare a new County Development Plan for the period 2018- 2024. This is the first consolidated County Development Plan for the entire functional area of Donegal County Council, including the former Town Council areas of Letterkenny, Bunrana and Bundoran.

On 19th May 2017, the Draft County Donegal Development Plan 2018-2024 and Environmental Report were published for a period of public consultation up to and including Friday 1st September 2017 and written submission and observations were invited in relation to it. The purpose of this report is to record the issues raised in the submissions during the public consultation process regarding the published Draft Development Plan, and to give the Chief Executive's opinion on the issues raised and recommendations for the adoption of the Plan. This report sets out a number of recommendations to amend the Draft Plan that would, if made, be a material alteration to the Draft Plan and these proposed Material Alterations are consolidated in section 4 of this report and addressed through the general recommendation at section 1.7 of this report.

In total, 312 submissions were received during the consultation period as follows:

- 20 submissions made by prescribed bodies including the Department of Housing, Planning and Local Government; the Department of Culture, Heritage and Gaeltacht and; the Northern and Western Regional Assembly.
- 275 submissions from members of the public together with an additional 9 late submissions and;
- 8 submissions from Elected Members and groupings of Elected Members.
- A number of cross-directorate comments.

1.2 Legislative requirements

In accordance with Section 12(4)(b) and (bc) of the Planning & Development Act 2000 (as amended) (P&D Act 2000 as amended), the Chief Executive's Report is specifically required to:

- (i) List the persons or bodies who made submissions or observations under this section.
- (ii) Summarise the following from the submissions or observations made under this section:
 - Issues raised by the Minister; and
 - thereafter, issues raised by other bodies or persons
- (iii) Give the response of the Chief Executive to the issues raised, taking account of any directions of the members of the authority, 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 of the Government or of any Minister of the Government and, if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands under subsection (3)(b)(iv) (P&D Act 2000 as amended)
- (iv) Summarise the issues raised and recommendations made by the relevant regional assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

In accordance with Section (5)(b) of the P&D Act 2000 as amended, the consideration of the Draft Plan and the Chief Executive's Report shall be completed within 12 weeks of the submission of the Chief Executive's Report to the members of the authority.

1.3 The Consultation Period

In accordance with Section 12 of the P&D Act 2000 as amended, the Draft Plan and Environmental Report were made available in English and Irish for public inspection and purchase during the period 19th May 2017 to 1st September 2017. The consultation period and invitation to make written submissions were advertised throughout the County via local newspapers and on an ongoing basis through the council's website, blog, Facebook page and twitter account.

In addition, six public drop-in events to facilitate consultation with the general public were arranged across the County over a two week period (Table 1.1 refers). These events were also advertised via local newspapers, the council's website, blog, Facebook page and twitter account. The drop-in events provided an opportunity for persons to view the Draft Plan and discuss it with members of staff. Staff from the Central Planning Unit were on hand to respond to specific queries and to advise on the process. Facilities were also made available at the drop-in events to make written submissions.

Table 1.1: Details of Drop- In Events

Location	Date	Time
The Base Enterprise Centre, Stranorlar	Tuesday 6th June 2017	3pm-8pm
An Clochán Liath (Dungloe) Public Service Centre	Wednesday 7th June 2017	3pm-8pm
Donegal Town Public Service Centre	Thursday 8th June 2017	3pm-8pm
Letterkenny Public Service Centre	Tuesday 13th June 2017	3pm-8pm
Carndonagh Public Service Centre	Wednesday 14th June 2017	3pm-8pm
County House, Lifford	Thursday 15th June 2017	3pm-8pm

1.4 Strategic Environmental Assessment and Appropriate Assessment

A Strategic Environmental Assessment and an Appropriate Assessment were carried out in respect of the Draft County Donegal Development Plan 2018-2024. The resulting Environmental Report accompanied the Draft Plan and the Natura Impact Report was made available for inspection.

1.5 Structure of the Report

This report focuses on groupings of submissions in relation to particular themes so as to consider the issues and responses in the collective. Therefore, the report is structured as follows:

Section 1: Introduction

Section 2: List of persons who made submissions

Section 3: Themed Responses and Recommendations:

- 3.1: Core strategy and housing
- 3.2: Economic Development
- 3.3: Infrastructure (roads, water, wastewater)
- 3.4: Flood risk
- 3.5: Rural housing
- 3.6: The natural and built heritage and the environment
- 3.7: Renewable energy
- 3.8: Tourism
- 3.9: The marine resource and coastal management
- 3.10: Community, culture and An Gaeltacht
- 3.11: The Environmental report and the Natura Impact Report
- 3.12: Site specific zoning requests

Section 4: Collation of Recommended Material Alterations

Appendix A: Summary of the Issues Raised in Each Individual Submission and Response and Recommendation (where appropriate)

Appendix B: Mapping

1.6 Next Steps


In accordance with the sections 12 (6) and (7) of the P&D 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 27th November, 2017 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 therefore, as previously advised by email, Members are requested to note and reserve the following as the dates on which workshops shall take place in Lifford:

1. Monday 6th November, 2017 (all day); and, if necessary
2. Wednesday 22nd November, 2017.

1.7 Recommendation

Therefore and in accordance with section 12(5)(a) of the P&D Act 2000 as amended, it is recommended that, the Members consider the Draft County Donegal Development 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 5 of the Chief Executive's Report subject to further steps as set out in sections 12(6) and (7) of the P&D Act 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 List of persons who made submissions

In total, 312 submissions were received during the consultation period as follows and are listed on the following pages:

- 20 submissions made by prescribed bodies including the Department of Housing, Planning and Local Government; the Department of Culture, Heritage and Gaeltacht and; the Northern and Western Regional Assembly.
- 275 submissions from members of the public together with an additional 9 late submissions and;
- 8 submissions from Elected Members and groupings of Elected Members.
- A number of cross-directorate comments.

2.1 List of submissions made by prescribed bodies

A summary of the issues raised in each prescribed body submission is set out in section 4 of this report, table 4.1.

Ref	Prescribed Body
PB01	Transport Infrastructure Ireland (TII)
PB02	Heritage Council
PB03	Derry City & Strabane District Council
PB04	The Department of Agriculture, Food and the Marine
PB05	Geoheritage Programme, Department of Communications, Climate Action & Environment, Geological Survey of Ireland,
PB06	Fermanagh & Omagh District Council
PB07	Failte Ireland
PB08	Northern Ireland Environment Agency
PB09	Inland Fisheries Ireland - Ballyshannon
PB10	Northern and Western Regional Assembly
PB11	EPA
PB12	Department of Culture, Heritage and Gaeltacht Development Applications Unit
PB13	An Taisce
PB14	Department of Housing, Planning and Local Government
PB15	Eirgrid
PB16	Causeway Coast and Glens Borough Council
PB17	ESB Business Service Centre
PB18	The Office of Public Works
PB19	Irish Water
PB20	Department of Education and Skills

2.2 List of submissions made by members of the public

A summary of the issues raised in each submission made by a member of the public is set out in section 4 of this report, table 4.2.

Ref	Name	Organisation/ Group
P01	David Davin	N/A
P02	Joseph Brennan	N/A
P03	Thomas J. Scott	N/A
P04	Not signed	N/A
P05	Kevin G Doherty	N/A
P06	Ronald Ferguson	N/A
P07	John Mc Cay	N/A
P08	Stephen Rossley	N/A
P09	Tony Rodgers	N/A

Ref	Name	Organisation/ Group
P10	Jim Harley	Harley Planning Consultants Ltd
P11	Malcolm and Charmaine Bowden	N/A
P12	Jim Harley	Harley Planning Consultants Ltd
P13	Jim Harley	Harley Planning Consultants Ltd on behalf of James McGettigan
P14	John Mc Cay Architect on behalf of Mr. Martin McKinney	N/A
P15	Barry McCullagh on behalf of Denis ad Margaret Grindel	Mc Cullagh Architecture & Surveying Limited
P16	Thomas McMenamin	N/A
P17	William Donoghue & Associates Ltd, Consulting Engineers & Architectural Services on behalf of Raymond & Laurence Molloy	William Donoghue & Associates Ltd, Consulting Engineers & Architectural Services
P18	G-M Design Associates on behalf of Letterkenny Rosemount Homes Ltd.	G-M Design Associates
P19	Michael Ward	N/A
P20	John McCay	John Mc Cay Architect
P21	John Cunningham and Seamus Shovlin	N/A
P22	Barry McCullagh on behalf of Patrick McDermott	McCullagh Architecture & Sureying Ltd.
P23	Rachel Furlong	N/A
P24	Vincent Breslin	N/A
P25	Jim Harley	Harley Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.
P26	Ronald Ferguson	N/A
P27	Jim Harley	Harley Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.
P28	Peter Mullan	N/A
P29	Morgan McCandless	N/A
P30	Sean O'Donnell	N/A
P31	Mark Gallagher	N/A
P32	Mervyn and Joyce Norris	N/A
P33	Bettina Bartmann	N/A
P34	William Doherty	N/A
P35	Noreen Donaghy	N/A
P36	Roger Garland	Keep Ireland Open
P37	Patrick and Tracey Gallagher	N/A
P38	Jim Harley	Harley Planning Consultants Ltd
P39	Jim Harley	Harley Planning Consultants Ltd
P40	Jim Harley	Harley Planning Consultants Ltc
P41	Seamus Mac Aodha	N/A
P42	Simon Doran	The Residents of Grianan Park, Burnfoot
P43	Imelda McBrearty	Friends of Lifford Hospital
P44	Imelda McBrearty	N/A
P45	Adelle Cassidy	N/A
P46	Trevor Robb	N/A
P47	Seanie Boyle	Donegal Irish Natural & Hill Farmers Association (INHFA)
P48	John Masterson	MH Associates
P49	Shaun McBride	N/A
P50	Brian Gilmore	Cement Manufacturers Ireland (CMI)
P51	John Halligan	N/A

Ref	Name	Organisation/ Group
P52	Cheryl Quinn	N/A
P53	Maire Mhic Phaidin	N/A
P54	Declan and Josie Deery	N/A
P55	Mary Grant	N/A
P56	Margaret Madden	N/A
P57	John Masterson	MH Associates
P58	Michael Ward	N/A
P59	Sean Sweeney	N/A
P60	Brendan Kelly	N/A
P61	Jim Harley	Harley Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.
P62	Ian Mc Cambridge	N/A
P63	Michael and Bernie Heeney	N/A
P64	Carol Duddy	N/A
P65	Francis Mc Ateer	N/A
P66	Gerard Columba McLaughlin	N/A
P67	Declan Reynolds	N/A
P68	Anne Marie McDermott	N/A
P69	Peter Crossan	Planning and Research Solutions
P70	Seamus Bovaird	N/A
P71	Danny & Kathleen O'Dwyer	N/A
P72	Bill Coffey	N/A
P73	Raymond and Patricia Treacy	N/A
P74	Don and Noreen Graham	N/A
P75	G. Smeaton	MH Associates
P76	G. Smeaton	MH Associates
P77	Martin O'Donnell	Martin O'Donnell Architectural Consultant
P78	Martin O'Donnell	Martin O'Donnell Architectural Consultant
P79	Martin O'Donnell	Martin O'Donnell Architectural Consultant
P80	Alan Doherty	Cruit island Residents Committee
P81	Liam McGuinness	Seacrest Seafoods
P82	Antoin MacGabhann	Mcgabhann Architects
P83	Liam and Raymond McGuinness	Moville Mussels
P84	Mary Thompson	Community Centre Glenties
P85	Danny & Christine Doherty	N/A
P86	Michael Quinn	N/A
P87	Mary Crumlish	Inishowen Wind Energy Awareness Group IWEAG
P88	Marian McCormick	N/A
P89	Kevin McGrory	N/A
P90	Ronnie Gilmore	N/A
P91	Bill Steele Cullinane Steele Architects	Cullinane Steele Architects on behalf of GR & GR Boal
P92	David Stevenson	N/A
P93	Ann Gallagher	N/A
P94	Ann Gallagher	N/A
P95	John Masterson	MH Associates
P96	John Masterson	MH Associates
P97	Philomena Kenealy	Ecopower Developments Ltd
P98	Paula Harvey	Ardrara GAP Heritage and History group
P99	Karl King	N/A
P100	Joseph Brennan	N/A
P101	Martin Gordon	N/A
P102	John Kalf	N/A
P103	Invalid entry in table	N/A

Ref	Name	Organisation/ Group
P104	Conal Newman	Conall Newman, Harley Newman Planning Consultants on behalf of PJ McDermott Group
P105	Conal Newman	Conall Newman, Harley Newman Planning Consultants on behalf of Patsy McGuinness
P106	Conal Newman	Conall Newman, Harley Newman Planning Consultants on behalf of Owen & Kathleen Gillespie
P107	Conal Newman	Conall Newman, Harley Newman Planning Consultants on behalf of Gineadoir Gaoithe Teoranta
P108	Conal Newman	Conall Newman, Harley Newman Planning Consultants on behalf of The Altnapaste Landowners Committee
P109	Conal Newman	Conall Newman, Harley Newman Planning Consultants on behalf of Ampco Builders Co Ltd
P110	Tony Carr	Carr Architects on behalf of Martin Houston and Alec O'Donnell
P111	Tony Carr	Carr Architects on behalf of Ms. Anne Corbett
P112	Mary Crumlish	N/A
P113	Eileen Hynes	N/A
P114	Veronica Shiels	N/A
P115	Edward Mc Fadden	N/A
P116	Joe Bovaird, Patrick Boyce, PM (Surname not legible), Dr. Daniel McGinley, Cllr Martin Farren	N/A
P117	Danny Mc Dermott	N/A
P118	James Ball	N/A
P119	Des Moore	N/A
P120	Hugh Wilhare	N/A
P121	John Boyle	N/A
P122	Michael McLaughlin	N/A
P123	Michael Barr	N/A
P124	Philip Doherty	N/A
P125	James Bonnar	N/A
P126	McIllwaine Shellfish	N/A
P127	Edward Gallagher	N/A
P128	Martin Coll	N/A
P129	John Duffy	N/A
P130	Anthony Duffy	N/A
P131	Conor Reid	N/A
P132	Damian Reid	N/A
P133	James Doherty	N/A
P134	Charlie Doherty	N/A
P135	Derek Diver	N/A
P136	Conor Blake	N/A
P137	Michael Halvin	N/A
P138	Jerry Gallagher	N/A
P139	John McKinney	N/A
P140	Alan Mc Glinchey	N/A
P141	Paul Mc Crudden	N/A
P142	Stephen Kearney	N/A
P143	Paul Mc Hugh	N/A
P144	Charlie McHugh	N/A

Ref	Name	Organisation/ Group
P145	Patrick Mc Daid	N/A
P146	Tiernan Mc Daid	N/A
P147	Shaun Mc Daid	N/A
P148	John Boyle	N/A
P149	Ostrea Teo	N/A
P150	Michael Scott	N/A
P151	Michael Scott	N/A
P152	Michael Scott	N/A
P153	Kevin O' Donovan	Element Power Ireland Limited
P154	Seamus Mc Menamin	Mantis Cranes (Ireland) Ltd
P155	Mary Carey	N/A
P156	Lauence Doherty	N/A
P157	Derek & Roisin Mc Laughlin	N/A
P158	Seamus Rodgers	N/A
P159	Jim Harley	Harley Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.
P160	Edel Doherty	N/A
P161	John Doherty	N/A
P162	Bernard Deehan Harry Deehan Donal Walker Kevin Mc Laughlin Michael McLaughlin	N/A
P163	Brendan Gallagher	N/A
P164	Robert Wasson	N/A
P165	Patricia & Stephen Bradley	N/A
P166	Marian Gallagher	N/A
P167	Dermot Mc Menamin	N/A
P168	John Conaghan	N/A
P169	Martin Browne	N/A
P170	Kirsty Pearson and Aron McGuire	The Meenbog Community Group c/o Kirsty Pearson and Aron McGuire
P171	Una Tourish	N/A
P172	Brendan Patton	N/A
P173	Geraldine Breslin	N/A
P174	Niall Crossan	N/A
P175	Karl Gallagher and Ursula Crossan	N/A
P176	Anne Morrow	N/A
P177	Maeve and Cormac Scully	N/A
P178	Paul Byrne	Kilcar Parish Council
P179	Patricia McGinty	N/A
P180	Steven Quinn	Derrykillev Community Windfarm
P181	Gerard Smith	Derrykillev Community Windfarm
P182	Patsy Quinn	Derrykillev Community Windfarm
P183	Ruairi McGee	Derrykillev Community Windfarm
P184	Sean Dolan	Derrykillev Community Windfarm
P185	Michael Quinn	Derrykillev Community Windfarm
P186	Mary Gildea	N/A
P187	Seamus Canavan	Canavan Associates on behalf of Corvin Wind Ltd
P188	Seamus Canavan	Canavan Associates on behalf of Corvin Wind Ltd
P189	Ulrike Kuhlmann	Canavan Associates on behalf of Dunfanaghy Regeneration Steering Group Committee
P190	Seamus Canavan	Canavan Associates on behalf of Mr. Pat Sweeney, Gortmacall, Milford

Ref	Name	Organisation/ Group
P191	Seamus Canavan	Canavan Associates on behalf of Inishgaoth Ltd
P192	Daniel McGinley	N/A
P193	Roci Allan	Allan Curran Architects Ltd on behalf of Mr. Johnny Hughes.
P194	Derek & Roisin McLaughlin	N/A
P195	Dan Callaghan	N/A
P196	Joanne Gaffney	Bord Iascaigh Mhara
P197	Margaret & Michael Hynes	N/A
P198	Aine Conaghan	N/A
P199	Sarah Conaghan	N/A
P200	Carl Scanlon	N/A
P201	Christina Martin	N/A
P202	Cordelia Nic Fhearraigh	N/A
P203	Margaret McCallig	N/A
P204	Jim Hughes	Fehily Timoney & Company
P205	Susan Mc Clafferty	N/A
P206	Martin O'Donnell	Martin O'Donnell Architectural Consultant on behalf of Foylegrange Developments Ltd.
P207	Charlene Mc Clintock	N/A
P208	Paul Doherty	Paul Doherty Architects Ltd on behalf of Rory McGinty
P209	Eunan Cunningham	WestBic
P210	Susan Tourish	N/A
P211	Louise Howard	N/A
P212	Martin O'Donnell	Martin O'Donnell Architectural Consultant on behalf of Foylegrange Developments Ltd.
P213	Tim Paul	SLR Consulting Ireland
P214	Michael McLaughlin	Canavan Associates Ltd
P215	Antoinette Doherty	N/A
P216	Ulrike Kuhlmann	Canavan Associates Ltd
P217	Anne McMenamin	N/A
P218	Claire Deasy	Brookfield Renewable
P219	John Campbell	JJ Campbell & Associates Civil and Structural Engineers
P220	Marie Scanlon	Finn valley Wind Action
P221	Ann Mulcrone	Reid Associates Planning Development Consultants
P222	Danny McNamee	N/A
P223	Michael McClafferty	N/A
P224	David Tourish	N/A
P225	Noel O'Donnell	N/A
P226	Monica O'Donnell	N/A
P227	Edward and Kathleen Byrne	N/A
P228	Martin O'Donnell on behalf of Seamus McKinney	N/A
P229	Michael and Padraig MacGinty	N/A
P230	Edel Burke	RES UK & Ireland Ltd.
P231	Joe Bonner	Joe Bonner Town Planning Consultant on behalf of Bernard Greene
P232	Anna Slevin	N/A
P233	Kenny Burke	OConnor Burke Architecture Ltd
P234	Áine O'Loughlen	N/A
P235	Séamas Ó Gallachóir	Údaras na Gaeltachta
P236	Martin O'Donnell	N/A

Ref	Name	Organisation/ Group
P237	Niall O'Brien	N/A
P238	David Kiely	Jennings O'Donovan & Partners Ltd
P239	Cressida Canavan	N/A
P240	Christopher Wallace	N/A
P241	Breda and Joseph Boyle	N/A
P242	John McCay	John McCay Architect on behalf of Patsy (PJ) Doherty
P243	Linda Lyons	Kilcar Parish Council
P244	John McCay	John McCay Architect on behalf of Patsy (PJ) Doherty
P245	Christina McEleney	Donegal Caravan & Camping parks Association
P246	John McCay	John McCay Architect on behalf of Patsy (PJ) Doherty
P247	Grace Canavan	N/A
P248	Michael Carr	Carr & Company
P249	Seamus Canavan	Canavan Associates Ltd
P250	Joanne Breen	ICBAN
P251	Adam Ledwith	IWEA Irish Wind Energy Association
P252	Kenneth Carson	N/A
P253	Monica and Seamus Doherty	N/A
P254	Shaun Ferry	N/A
P255	Valerie Brennan	Coillte
P256	Jimmy Green	McCarthy Kevile O'Sullivan Ltd Planning & Environmental Consultants
P257	Michael McGlinchey	N/A
P258	Séan Ó Murchadha	Conradh na Gaeilge
P259	Laurie J McGee	N/A
P260	Brian O'Byrne	N/A
P261	Barry Mc Cullagh on behalf of Glenmac Developments Ltd	Barry Mc Cullagh Architecture & Surveying Limited on behalf of Glenmac Developments Ltd
P262	Seán Ó Beirne	N/A
P263	Mai Mc Cann	N/A
P264	James Canavan	N/A
P265	Eunan Mc Carron	N/A
P266	Michael Doherty	N/A
P267	Billy Moyles on behalf of Annie May and Sean Gallagher	N/A
P268	Simon Bradshaw GVA Planning on behalf of Tesco Ireland Ltd.	GVA Planning on behalf of Tesco Ireland Ltd.
P269	Gearoidín Ní Charthaigh	Shanaway Energy Ltd
P270	Barry Mc Cullagh Architecture & Surveying Limited on behalf of Ms Lorna Barron	Barry Mc Cullagh Architecture & Surveying Limited on behalf of Ms Lorna Barron
P271	Lisa Doherty	N/A
P272	Peter Lefroy	Energia Renewables
P273	Michael Carr & Company on behalf of Swannet Gundry	Carr & Company on behalf of Swannet Gundry
P274	Elizabeth Swanwick	SSE
P275	Marie Scanlon	N/A
P276 (Late)	Mary McGlynn	N/A
P277 (late)	Damien McCallig	N/A
P278 (Late)	Edward Gallagher	Gallaghers Irish Premium Oysters
P279 (Late)	Maranna Sweeney	N/A
P280 (Late)	Neil Martin	N/A
P281 (Late)	Molly Reynolds	Donegal South Forum Ltd.

Ref	Name	Organisation/ Group
P282 (Late)	Anne Harrison	N/A
P283 (Late)	Charlotte du Plessis	N/A
P284 (Late)	Mary Carey	Mary Carey

2.3 List of submissions made by Elected Members and groupings of Elected Members

A summary of the issues raised in each submission made by Elected Members and groupings of Elected Members is set out in section 4 of this report, table 4.3.

Ref	Party/Councillor
LR1	Inishowen Elected Members
LR2	Fianna Fáil Grouping
LR3	Clr John Campbell
LR4	Clr Ciaran Brogan
LR5	Clr Seamus O'Domhaill
LR6	Clr Seamus O'Domhaill
LR7	Clr Seamus O'Domhaill
LR8	Clr Paul Canning

3 Themed Responses

The following areas are addressed in themed responses

- 3.1: Core strategy and housing
- 3.2: Economic Development
- 3.3: Infrastructure (roads, water, wastewater)
- 3.4: Flood risk
- 3.5: Rural housing
- 3.6: The natural and built heritage and the environment
- 3.7: Renewable energy
- 3.8: Tourism
- 3.9: The marine resource and coastal management
- 3.10: Community, culture and An Gaeltacht
- 3.11: The Environmental report and the Natura Impact Report
- 3.12: Site specific zoning requests

3.1 Themed response on core strategy and housing

3.1.1 Synopsis of the section of the Draft Plan

Chapter 2 of the Draft Plan sets out the Core Strategy which aims to provide the coordinated framework to deliver a connected place, enable economic growth, guide population growth within an appropriate settlement structure, facilitate measures to deliver on a high quality of life and to cooperate effectively within the regional context. It provides for ambitious population growth planning for a County population of 173,000 people by 2024 and it supports an 'All of County Strategy' to ensure the particular strengths and opportunities in all areas of the County are harnessed. It also recognises the cross border dimension and the ongoing work in relation to the North West City Region and in the context of the area of the Northern and Western Regional Assembly. The Core Strategy provides for a settlement structure made up of three layers namely Letterkenny (layer 1), the strategic towns (layers 2A and 2B) and the rural towns and open countryside (layer 3). The Core Strategy brings together the settlement structure, transport and retail strategies and also sets out the cumulative supply of residential land that is provided for in the Plan.

Chapter 6 of the Draft CDP sets out the policy framework in respect of housing including the 'Housing Strategy', urban housing (including holiday home development) and rural housing. Note that rural housing is addressed separately in the themed response on rural housing contained in section 3.5 of this report. The framework as regards the Housing Strategy and urban housing flows from the Core Strategy in terms of implementing the settlement structure; guiding residential growth so that it is appropriate in terms of scale, location and infrastructure; identifying areas of focus to meet social housing needs and; prioritising the importance of quality design and layout in new urban residential development.

3.1.2 Submissions referring to core strategy and housing

- A submission was/received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to core strategy and housing (Ref PB 14).
- Other submissions received from prescribed bodies: PB02 (The Heritage Council), P03 (Derry City & Strabane District Council-DCSDC), PB10 (NWRA), PB11 (EPA), PB13 (An Taisce), PB19 (Irish Water).
- Submissions received from members of the public: P10, P13, P18, P25, P27, P38, P39, P40, P42, P61, P76, P84, P102, P104, P105, P109, P158, P159, P164, P189, P228, P229, P259, P260
- Submissions received from Elected Representatives: LR1 (Inishowen Municipal District), LR2 (Fianna Fáil grouping), LR5 (Cllr O'Domhnaill), LR8 (Cllr Canning).

3.1.3 Summary of the issues raised in the submission made by the DoPHLG in relation to core strategy and housing

The submission of DoPHLG in relation to core strategy and housing outlines that the core strategy is clearly set out and also states that in broad terms, the Draft CDP provides a strategic framework for the proper planning and sustainable development of the area.

DoPHLG note that it is envisaged that the policy frameworks and land use zoning maps for Letterkenny, Buncrana and Bundoran will be superseded by LAPs and in this regard recommends that there must be a clearer set of arrangements to ensure compliance with the core strategy and that new residential development proceeds in an orderly fashion. In particular, DoPHLG describe the amount of land zoned as 'Strategic Residential Reserve' (SRR) as an excess of land and recommends that the status of SRR lands be reconsidered and amount of it reduced. The submission states that a reduction of at least 50% of the excess would be a significant step and recommends that clear articulation be provided of the LAP process and timeframe that is proposed to address this excess within the town plans of Letterkenny, Buncrana and Bundoran. The submission notes a number of policies that it states could result in an overly flexible approach in relation to release of SRR lands (specifically referencing UB-P-3, LK-H-P-2) and that these policies may place the Council under pressure to facilitate haphazard development and release of additional lands.

3.1.4 Summary of the issues in the remaining submissions

The remaining submissions range from strategic matters in the context of the National Planning Framework (NPF), the population ambition of the Plan and social housing strategy to more geographically specific issues related to housing land supply, the proposed settlement structure and other specific policy related matters.

In its broad commentary, PB10 (NWRA) reflects the high level comments of DoHPLG stating it is broadly supportive of the Core Strategy and proposed settlement hierarchy, noting that this approach is broadly consistent with the National Spatial Strategy (NSS) and the Regional Planning Guidelines (RPG's). NWRA suggest however that there could be better clarification of the differentiation between the role and function of Layer 2A and 2B towns together with clarification of the quantum of SRR lands proposed including consideration of an objective to reduce the extent of SRR sites via the LAP process. Similarly to DoHPLG, PB11 (EPA) notes the commitment in the Draft CDP to prepare LAP's in respect of specific towns and welcomes the commitment that all proposed LAPs will be consistent with the Core Strategy of the Plan. EPA also note that the requirements of the SEA, Floods, Water Framework and Habitats Directives and associated relevant national guidelines, should also be taken into account in preparing these LAPs. EPA also note section 2.9 of the core strategy chapter in relation to the establishment of a monitoring programme and recommend that SEA-related monitoring should also be incorporated.

Two public submissions and an elected representative submission (LR2) also comment on the strategic approach of the plan and the NPF referring to a resultant potential negative impact on rural communities, an over-emphasis on the North West City Region (NWCR) and the impact of lack of investment in infrastructure particularly in small towns. In addition, a public submission outlines concerns in relation to the impact of Brexit on the proposed strategy and the resultant deliverability of cross border transportation projects and other projects. Prescribed body submissions PB03, PB10 and PB19 (DC&SDC, NWRA and Irish Water respectively) also address the strategic context but focus more on the County's potential and position within the NPF, the forthcoming national Capital Investment Plan, the relationship between core strategies and water services plans and the opportunities of a collaborative regional approach as a mechanism to enable infrastructural projects in particular. DC&SDC in particular acknowledge the significant work undertaken by both Donegal County Council and DC&SDC arising from the challenges of Brexit, including the publication in February, 2017 of draft report entitled *'Initial Analysis of the Challenges and Opportunities of Brexit for the Derry City and Strabane and Donegal County Council areas-The NW City Region'*. NWRA specifically comment on the regional collaborations noting the approach through the NWCR but state it should comprehensively reference Strabane as well as Derry and Letterkenny, and also state that the Sligo City Region has a natural hinterland that overlaps with that of the NWCR. In this regional context the NWRA reference critical enabling projects including the N2/A5, upgrade of the Letterkenny-Lifford/Strabane road and the upgrade of the N13 and N15 along the Atlantic Economic Corridor. NWRA also advise that preparation of the Regional Spatial & Economic Strategy (RSES) is expected to commence in Quarter 4, 2017 and that, when the RSES is made, a Variation to the CDP may have to be considered.

In terms of social housing, elected representative submission LR2 outlines concern regarding the extent of the housing waiting list and suggests that the strategy of the NPF will not improve the trend. Submission LR2 also queries how social housing can be delivered in towns without sewage capacity while two public submissions suggest that social housing provision should be provided through options to deliver units in rural areas and in towns and villages including 'living over the shop' schemes and acquisition by Council of derelict properties for reuse for social housing purposes. NWRA (PB10) note the level of vacant buildings in the County and suggests consideration of a target in the Housing Strategy for the percentage of housing units to be provided by derelict/vacant buildings as well as inclusion of necessary provisions within Plan to give effect to the Vacant Sites Register in accordance with the Urban Regeneration and Housing Act, 2015 and the provisions of Circular PL7/2016.

Four submissions in total (3 made by elected representatives, LR1, LR2 and LR8, together with PB13 made by An Taisce) commented on the plan's content regarding the sequential growth of towns. In this regard An Taisce specifically referenced CS-O-12 and corresponding policy CS-P-5 (relating to the sequential growth of towns) as well as UB-P-6 (relating to the reuse and revitalisation of vacant or

derelict sites) and outlined their full support of the approach. LR1, LR2 and LR3 also referred to CS-P-5 but suggest a combination of revisions including that it be (i) removed/revised to reflect the need of smaller towns (ii) that it be removed and replaced with a requirement for the submission of a report that justifies the project and its location and (iii) that it be clarified that it would not preclude the consideration of small, neighbourhood scale facilities in non-town centre areas.

A significant number of submissions were received from members of the public seeking site specific rezoning proposals across a number of towns and these are detailed individually in the themed response entitled 'Site Specific Zoning Requests' contained in section 3.12 of this report. A number of these submissions, relating to lands in Letterkenny, Ballybofey-Stranorlar, Killybegs, Donegal town and Carndonagh made specific reference to the core strategy in relation to the shortfall of residentially zoned land as set out in table 2.6 of the Draft CDP and stated that the specific rezoning requests would immediately address the identified shortfall, that existing residentially zoned lands had failed to deliver and that to consider the rezoning in the context of Local Area Plans would result in an unacceptable delay where there is immediate need for housing.

Six locations were referenced across a number of submissions in terms of their placing, status and/or description within the settlement structure of the core strategy, namely Bridgend, Portnablagh, Dunfanaghy, Killybegs, Glenties and Malinbeg. The summary comments are set out hereunder in relation to each location:

- Bridgend: Submission P42 (on behalf of Grianan Park Residents, Burnfoot), describes the identification of Bridgend as a layer 2B town as representing a downgrading from its status and states that it would result in a development constraint particularly in relation to necessary investment in water services. The submission requests that Bridgend be identified as a layer 2A town due to its strategic location and that there be a focus on current EPA quality and capacity issues within Bridgend and its environs.
- Portnablagh: A public submission and a submission made by an elected representative (LR5) requested that Portnablagh be included as a settlement in the Plan as it is a major tourist village along the WAW and not being designated as a town could restrict its potential growth and development. The public submission furthermore outlined the importance of small towns and villages as having significant potential and requested that all towns 'demoted' including Portnablagh should be re-designated.
- Dunfanaghy: Submission 189 made on behalf of Dunfanaghy Regeneration Group set out proposals for the regeneration and development of Dunfanaghy as a baseline that could lead to a local plan for the town.
- Killybegs and Glenties: Two submissions cited additional reasons for identification of these towns as strategic towns; Killybegs in relation to its regional tourism function and Glenties in relation to its built and archaeological heritage function, sport and recreation and that it is culturally and politically important due to the MacGill Summer School/ proximity to the Laurels.
- Malinbeg: One submission requested that it be included in Layer 3 of the settlement structure due to its strategic location at the end of the Wild Atlantic Way and proximity to Sliabh Liag.

Two submissions commented on aspects of the holiday home policy in the Draft CDP. The first outlines that policy RH-P-11 of the existing development plan (2012-2018) provides for holiday homes to be considered outside the 20% balance of holiday homes to permanent homes if they are proposed within settlement envelopes on brownfield sites. The submission outlines that this has not been carried forward into the Draft CDP and suggests wording of a new policy within the urban housing policies to address the gap. The second area addressed in relation to holiday homes relates to policy UB-P-24 (seeking a balance between holiday homes and permanent homes in settlement envelopes) stating that it effectively results in a moratorium on holiday home developments in towns like Dunfanaghy. The submission refers to an unfinished holiday home development and states policy UB-P-24 is unreasonable in a location such as Dunfanaghy, which is a Layer 2B settlement for reasons of its tourism potential with respect to the Wild Atlantic Way.

In addition, PB02 (The Heritage Council) suggest the inclusion of effective landscape planning and management as a priority in the Core Strategy including the inclusion of the European Landscape Convention's definition of landscape in the Core Strategy chapter.

3.1.5 Chief Executive's response

Generally, the issues raised during the consultation period in so far as they relate to core strategy and housing, support the overall approach set out in the Draft CDP and confirm general consistency with the NSS and RPG's. This is evidenced in particular through the submission of the DoHPLG.

Acknowledging the expressed concerns in relation to the strategic approach, it remains essential to continue significant engagement within the NPF and RSES processes and this engagement is impacting on and shaping emerging national and regional policy. In this regard, the interests of County Donegal are being clearly and evidentially presented and this approach shall be continued. In developing the 'Strategic Contents' of the Draft CDP it is acknowledged that there are potential challenges ahead for the County in terms of the roll out of national and regional policy including the identification of investment and funding requirements and arising from Brexit. This Plan however focuses on ensuring an effective, robust and ready-to-go spatial planning framework that will support the Council to take up the opportunities that will present, to counter the challenges and to realise the County's potential, while working within the parameters that are set at national and regional level. The strategic and regional approach of this Draft CDP, subject to a number of recommendations for minor adjustments in relation to referencing of the regional context (set out in the Recommendation 1, refs (a) and (b) in section 3.1.6) provides a positive, robust and forward thinking framework for the County.

The more specific comments, while having much merit and value and resulting in a number of recommendations set out on the following pages, are not fundamental in terms of the overall approach of the core strategy and are addressed under the following sub-headers:

- (i) Preparation of LAPs and SRR lands
- (ii) The Housing Strategy the Urban Regeneration and Housing Act 2015
- (iii) The concept of the sequential growth of towns
- (iv) Settlements within the settlement structure
- (v) Holiday home policy
- (vi) The Core Strategy and landscape.

(i) Preparation of LAP's and SRR lands

This Draft CDP is the first consolidated County Development Plan for County Donegal, including the former Town Council areas of Letterkenny, Buncrana and Bundoran. It therefore continues the current land use and zoning frameworks in respect of Letterkenny, Buncrana and Bundoran, largely in their existing form together with the consolidation of their written texts in order to avoid an unacceptable policy vacuum and thus secure the continued implementation of objectives and policy on adoption in 2018. The Draft CDP however, acknowledges the need for further detailed reassessment of the planning frameworks for Letterkenny, Buncrana and Bundoran together with the completion of a Local Area Plan for 7 other strategic towns (An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs) and therefore commits to a programme of LAP's and this programme is referenced in the Draft CDP within:

- Chapter 2, section 2.5, page 18 which provides indicative timeframes for the programme.
- Chapter 2, footnotes to table 2.6, page 19.
- Chapter 2, section 2.9, CS-O-15, which states an objective, 'To prepare Local Area Plans in respect of Letterkenny and the Strategic Towns identified in Layer 2A, together with Settlement Framework Plans for the towns in Layer 2B.
- Chapter 2, section 2.11, page 24, last sentence of policy CS-P-3.
- Appendix 1 of Part A, section 1.2, page 38.

Notwithstanding, the comments of DoHPLG in terms of clarifying the arrangements for LAPs are noted and therefore Recommendation 1, refs (c) and (d) in section 3.1.6 of this report propose to add further additional confirmation of the arrangements and anticipated timeline for the preparation of LAPs for Letterkenny, Buncrana and Bundoran. It is also noted that the content of the Draft LAP for 7 Strategically Located towns has been agreed at the meeting of Donegal County Council on 2nd October 2017 and arrangements are currently being made for translation and publication to facilitate the statutory consultation period.

The programme for preparation of LAP's will provide the appropriate mechanism within which the necessary detailed assessments and consideration can be given to site specific zoning requests and the

identification of appropriate lands to address any shortfall in residentially zoned land, as raised in public submissions, and to the extent of land that is zoned SRR for the purposes of long term landbank as raised by DoHPLG. Therefore, it is considered that further amendments at this point to the land use zoning frameworks of Letterkenny, Bunrana and Bundoran as well as the settlement framework maps relating to the towns covered by the forthcoming Draft LAP for 7 Strategically Located Towns, would be premature as any such amendments would not be appropriately evidenced based. The only exceptions in this regard, are those which may arise from a stage 1 Strategic Flood Risk Assessment (set out in more detail in the themed response on flood risk). In addition, and again in the absence of detailed assessment and evidence base, it is not considered appropriate to set an arbitrary percentage target for reduction in SRR lands. In lieu and as suggested in submission PB10 (NWRA), recommendation 2 in section 3.1.6 of this report provides for the insertion of a new objective (as a proposed material alteration) to review the location and extent of land zoned 'Strategic Residential Reserve' through the planned Local Area Plan programme.

The DoHPLG submission references policies UB-P-3 and LK-H-P-2 which relate to proposals for residential lands at locations other than the prescribed residential zonings and state that these policies could result in an overly flexible approach and place the Council under pressure to facilitate haphazard development and the release of additional lands. The anomaly identified by the DoHPLG between the policies is clarified in that policy UB-P-3 is to provide for an interim position in respect of the 7 towns covered by the forthcoming Draft Local Area Plan as the zoning in the Draft CDP in each settlement framework relating to the 7 towns demonstrates a significant shortfall in the amount of residential land zoned. The Draft Local Area Plan will bring forward proposals to address this shortfall and shall, once adopted provide a range of options for new residential development. For the purposes of clarification, Recommendation 1, ref (e) in section 3.1.6 of this report provides a minor adjustment to policy UB-P-3 to specify that this policy applies to the towns to be covered by the forthcoming LAP and does not relate to Letterkenny, Bunrana and Bundoran. Policy LK-H-P-2 which relates to Letterkenny and similar policies for Bunrana and Bundoran, provide for the release of SRR lands through the processes only of review or variation/amendment as appropriate. It is considered that this is a clear policy statement in relation to SRR lands in Letterkenny, Bunrana and Bundoran and is unambiguous on the process for release of SRR lands. As a result, a further amendment to policy LK-H-P-2 and the similar policies in relation to Bunrana and Bundoran is not considered necessary.

(ii) The Housing Strategy and the Urban Regeneration and Housing Act 2015

The comments and suggestions arising from submissions in relation to options for the delivery of social housing endorse the approach set out in the Housing Strategy contained in section 6.1 of chapter 6 of the Draft CDP. In this regard, the Housing Strategy outlines that meeting housing need will involve a range of allocation of tenancies under the Council's own Social Housing Programme and through a continued long standing positive relationship with Approved Housing Bodies. It will also require collaboration with key service providers including Irish Water where there are deficiencies in water and waste water so as to work to deliver the right accommodation types, at appropriate locations and subject to adequate infrastructure. Moreover and in line with the Government's Strategy, 'Rebuilding Ireland, an Action Plan for Housing and Homelessness,' 2016, the Housing Strategy recognises a need to refocus an element of supply to bringing privately owned vacant and derelict units back into productive use with a view to providing homes in places that are close to services and amenities as well as contributing to regeneration and renewal. The Council will continue to work within the framework of the Housing Strategy and on a collaborative basis to deliver social housing to meet the recognised need identified on the housing waiting list.

In addition, opportunities to explore the potential of delivering serviced sites within towns and villages may offer greater choice and option and this is expressed as an objective of the Draft CDP through objective UB-O-8. The Council's Vacant Sites Register, established on 1st January 2017, will also contribute to meet social and other housing and regeneration needs and the identification of vacant and regeneration sites in towns identified as Layer 2A is provided for under objective TV-O-7. This process will be an essential component of the preparation of a LAP for Letterkenny, providing a site activation and release mechanism and potentially incentivising the development of vacant or idle sites that are identified through the LAP as 'regeneration land' or 'residential land' with a view to bringing such sites

to beneficial use. To clarify the approach and indicate the priority for the further identification of such lands, Recommendation 1, ref (f) set out in section 3.1.6 of this report provides for minor adjustments to objective TV-O-7.

(iii) The concept of the sequential growth of towns

Policy providing for the sequential growth of towns resulted in a small number of submissions which are mixed in their nature. Planning, through from development plan policy to the development management process, is the essential mechanism to ensure the step by step growth of towns, the natural development of neighbourhoods and the sustainable management of space and the environment. CS-P-5 which states, *'It is the policy of the Council to guide development of towns in a sequential manner, outwards from the core area in order to maximise the utility of existing and future infrastructure provision, promote the achievement of sustainability, avoid 'leap-frogging' to more remote areas and to make better use of under-utilised land'*, is broad in its language and is a positively positioned policy. It is an essential tool in ensuring new development contributes to strengthening towns, in creating places in which people can live close to necessary and expected facilities and amenities and where best value can be gained in investment in infrastructure. It is therefore considered that Policy CS-P-5 be retained in its current form as one of the most important tools in the suite of planning policy. However and to clarify, it does not preclude the development of neighbourhood level retail facilities in Letterkenny and the towns identified as Layer 2A where such shops are clearly designed and located to serve distinct residential neighbourhoods and this is directly provided for through policy RS-P-7.

(iv) Settlements within the settlement structure

The settlement structure comprises the County's large network of towns and villages (62 in total) and importantly its wider rural area which provides for significant community and economic vibrancy in the County. The number of locations that are identified as towns and villages in the draft CDP is the same as identified in the existing CDP (2012-2018) and therefore the assertion that towns have been 'demoted' during the preparation of this Draft CDP is not accurate. In this regard and during the preparation of the existing CDP (2012-2018) a comprehensive exercise was undertaken to review the extent of previous 'control points' in the context of a range of indicators including population, historical context, diversity of land uses and infrastructural capacity and thus identified 62 locations which could be clearly identified as towns and villages together with a range of other locations that are better considered as forming part of and contributing to rural communities and therefore their continued vibrancy and appropriate growth could be better catered for under the rural policies of the plan. Therefore, the number of towns brought forward within the proposed settlement structure of the Draft Plan has not altered since 2012.

However, the proposed settlement structure in terms of its component parts and placement of settlements has been developed and renewed in the Draft CDP as it identifies Strategic Towns (Layer 2) as not only comprising the County's largest towns where the more significant levels of multiple residential development is envisaged but also identifies a range of other towns and villages due to their special economic function. This approach responds to the vision of the Plan which includes that Donegal will have a strong, competitive and innovative economy. The Core Strategy of the Draft CDP acknowledges the status of essential infrastructure services, namely water and wastewater in relation to Layer 2A towns through Table 2.4 on page 17 of the Draft CDP and this information is recommended to be extended to provide the status of layer 2B towns also through the themed response on infrastructure set out in section 3.3 of this report. Table 2.4 identifies the locations where there are deficiencies in water infrastructure as is also highlighted the elected representative submission (LR2). Notwithstanding the identified deficiencies, the economic potential of all 23 layer 2 towns is a valid objective of the Plan and significant progress can be undertaken to harness their potential alongside work to explore the mechanisms that are available to bring water services to an appropriate level. The submission of Dunfanaghy Regeneration Group (P189) is good example of the type of activity outside of the specific issues of water services infrastructure that can be advanced in order further develop the economic capacity of the town. In this regard, the suggestions of Dunfanaghy Regeneration group are noted and do not result in any proposed amendments to the plan. The specific suggestions in relation to Killybegs and Glenties in order to identify additional reasons for their designation as layer 2B towns

are noted as reasonable and are provided for through Recommendation 1, ref (g), in section 3.1.6 of this report.

The concerns in relation to Bridgend and its placing in the settlement structure as a layer 2B 'Strategic Town with Special Economic Function' are noted. However, as outlined in the paragraphs above, its identification as a Layer 2B town will not preclude the potential future investment and provision of adequate water services and indeed it is noted that Irish Water are due to commence a feasibility study for the upgrade of Bridgend WWTP. Bridgend, unlike the larger towns identified as Layer 2A, is not targeted for significant growth in residential development. However, its identification as a Layer 2B town precisely and appropriately recognises its strategic economic location as noted in the submission, adjoining the border and therefore no further amendment in this regard is recommended.

In the Draft CDP, Portnablagh and Malinbeg are identified as forming part of the open countryside element of Layer 3 'Rural Towns and Open Countryside.' Having regard to the extent of established housing in Portnablagh, (whilst noting however that it comprises a significant level of holiday home development), and its resultant role as a tourist base, it is considered that the identification of Portnablagh as a 'rural town' within Layer 3 is reasonable and may provide opportunities to consolidate future development and to identify other actions to advance the capacity in the area for tourism product development and other associated facilities. Therefore, Recommendation 3 (as a proposed material alteration) in section 3.1.6 of this report provides for identification of Portnablagh as a rural town within Layer 3 together with the insertion of a settlement framework map in Part C of the Draft plan including a settlement envelop to define the extent of the town.

Malinbeg however, represents as a distinctly rural area providing predominantly for a collection of rural housing in a dispersed settlement pattern. Its location in relation to the WAW and its proximity to the signature point of Sliabh Liag are noted but to identify the area as a 'Rural town' within Layer 3 could be detrimental to the inherent and special characteristics of the area as it would provide a policy framework for urban type developments and densities. In lieu, Malinbeg is considered to be better catered for through the rural policies of the plan which, in relation to economic development, provide for opportunities such as business that could serve as a valuable addition to the local economy and/or tourism offering in the area or comprise home-based business of limited scale (circa 1-2 employees) (ED-P-13 refers). Therefore, it is not recommended that the Draft CDP be amended in relation to Malinbeg.

(v) Holiday home policy

The holiday home policy of the Draft CDP drew only limited commentary in the submissions (2 public submissions). This policy approach recognises the significant extent of holiday home units across both the urban and rural parts of the County and notes that the sector provides only short term benefit to the local economy. The purpose of the strategy in the Draft CDP is to manage growth of new holiday homes in an attempt to maintain a balance so as to protect the supply of permanent housing need as well as supplying tourism potential over a longer term period. In addition, the significant level of vacant units in the County provides opportunity for reuse for the purposes of holiday homes and is a preferred and viable option over new build holiday home developments. The strategy in relation to holiday homes is considered to be an appropriate and sustainable approach and therefore it is considered that policy UB-P-24 (which seeks a balance between holiday homes and settlement envelopes) should be retained in its current form. Notwithstanding, a public submission notes the omission of policy providing for holiday home development to be considered outside of the 20% balance if located within a settlement framework and on brownfield lands and provides a suggested policy to fill the gap. This approach is considered to represent a sustainable form of development and is noted as having formed part of RH-P-11 of the existing CDP (2012- 2018). As a result, a new policy reflecting RH-P-11 of the existing CDP is recommended for inclusion in the Plan through Recommendation 4 (as a proposed material alteration) in section 3.1.6 of this report.

(vi) The Core Strategy and landscape.

The importance of 'landscape' is threaded throughout the plan and specifically and appropriately addressed in chapter 7 in relation the natural and built heritage. Chapter 7 references the County's distinctive and unique landscape, its nature as a tourism resource and its characteristics as being made

up of a myriad of factors including geology, landcover, natural heritage, built heritage and cultural heritage. Submission PB02 (The Heritage Council) requests that the European Landscape Convention is referred to in the Core Strategy including its definition of landscape. It is however considered that landscape is appropriately referenced in detail under section 7.1 of the Draft CDP and subsequently provided for in that section through the suite of objectives and policies. Having regard to the extent of integration of 'landscape' throughout the Plan, it is not considered that any further re-adjustment is required to provide further reference in the Core Strategy.

3.1.6 Recommendations

Recommendation 1:

It is recommended to carry out the following minor edits and non-material amendments as follows:

Item	Amendment
(a)	<p>To insert additional text in Chapter 1, section 1.1, page 1 within the 3rd paragraph so that it read as follows (new text shown in blue, text to be deleted shown in strikethrough):</p> <p>Given the diversity and geographical extent of County Donegal (Figure 1.1 refers), opportunities for regional cooperation are being harnessed across all of the County's borders through (i) the area of the Northern and Western Regional Assembly (NWRA) comprising the counties of Donegal, Monaghan, Cavan, Leitrim, Sligo, Mayo, Roscommon and Galway and; (ii) in the context of the North West City Region comprising all of Donegal County Council (DCC) and Derry City & Strabane District Council (DCSDC) areas, with Letterkenny, Strabane and the City of Derry-Londonderry as its linked metropolitan areas.</p>
(b)	<p>To amend Strategic objective S-O-1 in Chapter 1, section 1.6, page 8 so that it read as follows (new text shown in blue, text to be deleted shown in strikethrough):</p> <p>S-O-1: To plan for population growth to 173,000 people by 2024 and subsequently to plan for further population uplift to upwards of 200,000 people by 2038 so as to secure critical mass in the County and thereafter to contribute to the critical mass of (i) the North West City Region with Letterkenny, Strabane and the city of Derry-Londonderry as its key urban settlements and; (ii) the area of the NWRA in particular Counties Sligo, Leitrim, Monaghan and Cavan as well as partners in Fermanagh and Omagh District Council.</p>
(c)	<p>To insert additional text in Chapter 1, as a new section 1.6 and to renumber sections thereafter so that it reads as follows (new text shown in blue, text to be deleted shown in strikethrough):</p> <p>1.6 Local Area Plan Programme</p> <p>This Draft CDP is the first consolidated County Development Plan for the entire of County Donegal, (including the former Town Council areas of Letterkenny, Buncrana and Bundoran). It therefore continues the current land use and zoning frameworks in respect of Letterkenny, Buncrana and Bundoran and consolidates their associated written texts. A planned programme to prepare LAP's in respect of Letterkenny, Buncrana and Bundoran which is confirmed through core strategy objective CS-O-11, will provide the appropriate level of assessment and detail to review and further update the planning frameworks in respect of each including ensuring the consideration of the appropriate evidential base. The programmed Local Area Plans will address the identified shortfall of 1st phase residential lands in Letterkenny as well as the extent of lands zoned 'Strategic Residential Reserve' as a long term residential land bank (SRR) in each town.</p> <p>The indicative timescales for the planned programme of LAPs is as follows:</p> <ul style="list-style-type: none"> ▪ Publication of a draft Local Area Plan in November 2017 in respect of An Clochán Liath, Ballybofey-Stranorlar, Ballyshannon, Carndonagh, Donegal Town and Killybegs (and also including Bridgend) and target for adoption as the final plan during Q2, 2018. ▪ Preparation of a draft Local Area Plan in respect of Letterkenny (Target commencement Q1, 2018).

Item	Amendment						
	<ul style="list-style-type: none"> ▪ Preparation of draft Local Area Plans in respect of Bundoran and Buncrana (Target commencement 4th quarter 2018). 						
(d)	<p>To amend text in Chapter 2, section 2.5, page 18 so that it reads as follows (new text shown in blue, text to be deleted shown in strikethrough):</p> <p>The LAP programme will deliver appropriate land supply consistent with the population targets and HLR of this Plan through the following sequence:</p> <ul style="list-style-type: none"> (i) Publication of a draft Local Area Plan in November 2017 in respect of An Clochán Liath, Ballybofey-Stranorlar, Ballyshannon, Carndonagh, Donegal Town and Killybegs (and also including Bridgend) and target adoption as the final plan during Q2, 2018. to follow the publication of the draft County Development Plan 2018-2024 and its core strategy. (Target for draft LAP is mid 2017). ▪ Preparation of a draft Local Area Plan in respect of Letterkenny (Target commencement (Target commencement Q1, 2018). 3rd quarter 2017). ▪ Preparation of draft Local Area Plans in respect of Bundoran and Buncrana (Target commencement 4th quarter 2018). 						
(e)	<p>To insert additional text into policy UB-P-3 contained in section 6.2.3, chapter 6 so that it reads as follows (new text shown in blue, text to be deleted shown in strikethrough):</p> <p>UB-P-3: It is a policy of the Council that prior to the making of the relevant Local Area Plan for 7 strategically located towns (An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Ballyshannon, Bridgend Carndonagh, Donegal Town and Killybegs, Layer 2A towns), where an application for residential development is proposed on land that does not have a positive residential zoning (or a mixed use zoning including an element of residential) the proposal shall be considered having regard to the level of uptake of other zoned lands for housing in the particular town and in the context of the Core Strategy and other policy of the County Development Plan including Part C and in the context of the proper planning and sustainable development of the area</p>						
(f)	<p>To amend the text of objective TV-O-7, section 3.4 of chapter 3 so that it reads as follows (NB: New text shown in blue and text to be deleted shown in strikethrough):</p> <p>TV-O-7: To identify 'vacant' sites and 'regeneration sites' in towns identified as Layer 2A, in accordance with the Urban Regeneration and Housing Act 2015 and in order to encourage revitalisation in Letterkenny and Buncrana and if appropriate, in the remainder of Layer 2A towns through the preparation of their respective Local Area Plans.</p>						
(g)	<p>To amend table 3.2, section 3.3, chapter 3, pages 29 and 30 in relation to Killybegs and Glenties so that it reads as follows (NB: New text shown in blue and text to be deleted shown in strikethrough):</p> <table border="1" data-bbox="399 1668 1077 2036"> <thead> <tr> <th data-bbox="399 1668 558 1702">Town</th> <th data-bbox="558 1668 1077 1758">Reasons for Identification as a 'Strategic Town', Performing a 'Special Economic Function.'</th> </tr> </thead> <tbody> <tr> <td data-bbox="399 1758 558 1960">Killybegs</td> <td data-bbox="558 1758 1077 1960"> Development Centre with a focus on the establishment as an Innovation Hub for marine resources, including food, energy and ocean energy. Marine- Port and fishing related industry. Regional Tourism Function and Wild Atlantic Way. Tourism associated with cruise liners. Area of important archaeological heritage. </td> </tr> <tr> <td data-bbox="399 1960 558 2036">Glenties</td> <td data-bbox="558 1960 1077 2036"> Tourism (and linked to Ardara). Heritage and Culture Recreation </td> </tr> </tbody> </table>	Town	Reasons for Identification as a 'Strategic Town', Performing a 'Special Economic Function.'	Killybegs	Development Centre with a focus on the establishment as an Innovation Hub for marine resources, including food, energy and ocean energy. Marine- Port and fishing related industry. Regional Tourism Function and Wild Atlantic Way. Tourism associated with cruise liners. Area of important archaeological heritage.	Glenties	Tourism (and linked to Ardara). Heritage and Culture Recreation
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Glenties	Tourism (and linked to Ardara). Heritage and Culture Recreation						

Recommendation 2:

To insert an additional objective into chapter 2, section 2.10, as CS-O-17 page 24 so that it reads as follows (new text shown in blue, text to be deleted shown in ~~strikethrough~~):

CS-O-17: To review the location and extent of lands zoned 'Strategic Residential Reserve' to ensure the appropriate supply of long term housing landbank.

(This is a material alteration).

Recommendation 3:

To amend table 2.3, section 2.3.3, chapter , page 16 so as to insert Portnablagh as a named town within 'Layer 3 Rural Towns and open Countryside' and therefore in addition to:

- (i) Amend Table 15.2 of Part C, page 93 so as to insert Portnablagh as Map 15.60 and;
- (ii) Insert an additional Settlement Framework map for Portnablagh as shown on the map contained in Appendix B of this report into the Layer 3 Settlement Framework maps contained in Part C.

(This is a material alteration).

Recommendation 4:

To insert a new policy as UB-P-29 at section 6.2.3, chapter 6, page 100 so as to read as follows (NB: New text shown in blue and text to be deleted shown in ~~strikethrough~~):

It is a policy of the Council that holiday home development will be considered within the settlement framework areas without the application of a restriction in terms of the balance between holiday homes and permanent homes (policy UB-P-24), subject to environmental and heritage designations and amenity considerations and where the applicant can demonstrate that the site is a brownfield site within the urban fabric of a settlement framework and its development for holiday home purposes is of a size and scale that would not be detrimental to the character of the settlement. A brownfield site is one that has been previously built upon. It excludes parks, recreation grounds, private or public open space, allotments, forestry lands/buildings agricultural lands and land where the remains of the previous use have blended into the landscape, or have been superseded by landuse zonings or lands of conservation value or amenity use.

(This is a material alteration).

3.2 Themed response on Economic development

3.2.1 Synopsis of the section of the Draft Plan

Chapter 4 sets out the economic development strategy of the Draft CDP and it includes the Retail Strategy. It aims to provide for the appropriate growth of economic development and employment opportunities across all sectors. It is linked to the Core Strategy of the Plan and recognises the key role of the County's network of strategic towns in driving employment and economic activity. It also importantly recognises the significant level of existing economic activity and local employment that occurs in the County's rural areas and sets out a suite of objectives and policies to provide for further appropriate economic development in these areas. Tourism is addressed separately within the themed response on tourism contained in section 3.8 while the sector of aquaculture is addressed in the themed response on the marine resource and coastal management contained in section 3.9 of this report.

3.2.2 Submissions referring to Economic Development

- A submission was received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to economic development (PB14).
- Other submissions received from prescribed bodies: PB01 (TII), PB03 (DCSDC), PB10 (NWRA), PB13 (An Taisce)
- Submissions received from members of the public: P03, P12, P208, P209, P232,
- Submissions received from Elected Representatives: LR1 (Inishowen Municipal District), LR2 (Fianna Fáil Grouping), LR4 (Cllr Brogan)

3.2.3 Summary of the issues raised in the submission made by the DoPHLG in relation to economic development

The DoPHLG submission, in so far as it relates to economic development, provides a 'minor observation' relating to the economic development zonings in Buncrana suggesting they should be reassessed in terms of scale, location and need by providing an evidence based approach and it is recommended that the overall quantum of each development zone is provided alongside the land use zoning map.

3.2.4 Summary of the issues in the remaining submissions

The remaining submissions in relation to economic development are categorised into five distinct areas and the issues raised in each area are set out below.

(i) Broad comments

A range of broad comments were raised in a number of submissions including an acknowledgement of the challenges arising from Brexit (LR2 and PB03-DCSDC). The submission of DCSDC also noted the ongoing collaborative work between Donegal County Council and DCSDC in this regard while also noting the importance of collaboration on investment in infrastructure and guiding economic development. Two prescribed body submissions (DCSDC and NWRA) noted the role of settlements in particular Letterkenny, in driving economic development. A public submission suggests the Draft Plan is lacking in relation to agricultural development.

(ii) Site specific requests for rezoning of lands for economic development purposes.

Four submissions were received from members of the public requesting lands be rezoned/ settlement envelop boundaries amended (at Manorcunningham, Ballybofey-Stranorlar, Muff and Milford) in order to provide for a land use zoning that would support economic development types.

(iii) Locational policies for economic development in rural areas:

A range of comments across the public, prescribed and elected representative's submissions commented on the locational policies for rural economic development as follows:

- Submission LR1 and LR2 suggested that ED-P-3 should be amended so as to consider development comprising industrial buildings or processes in rural areas without the proviso that it must be demonstrated that the proposed development could not be located in a settlement.
- An elected representative submission outlined that small businesses that provide a service to the local area should be permitted in the rural area if the infrastructure supports it.
- A public submission suggests wording to facilitate home-based business in the rural area to state as follows: 'It is an objective of the Council to encourage and facilitate rural home-based employment of appropriate type, size and scale (e.g. circa 1-2 employees), where it can be demonstrated that the development will not have significant adverse effects on the environment, including the integrity of the Natura 2000 network, residential amenity or visual amenity.' The submission stated that the proposed policy offers little or no comfort to new potential home based rural enterprise.

(iv) Locational policies for retail development:

A range of comments across public, prescribed and elected representatives submissions commented on the locational policies retail development as follows:

- Suggestion that out-of-town and larger scale retail outlets should be promoted in small towns so to provide ready accessibility. Notes the difficulty in accessing town centres.
- In relation to Table 4.2.1 of the draft CDP and its objectives and policies, a submission states that the restriction placed on retail types for towns other than layer 1 and 2 have a detrimental and negative effect on the remainder of towns.
- PB01 (TII) acknowledges the plan in terms of its support for concentrating retail uses in town centres and the application of the sequential test but states that the Retail Planning Guidelines, 2012 outline an 'explicit presumption' against large out-of-town retail centres located adjacent or close to existing, new or planned national roads/motorways and request that this be included in the Draft CDP.
- PB13 (an Taisce) state there should be policies to prohibit out-of-centre retail development and suggest that the Planning Authority should take an active role in site assembly for new retail development on brownfield and infill sites, including CPO powers in order revitalise towns.
- PB13 suggest that car parking charges should be required for out-of-centre retail development whilst also waiving parking requirements and levies for shortfalls for retail developments in town centre.
- PB13 states that a policy should be provided to state that a change of use from retail warehouse to non-bulky retail goods comparison and/or convenience uses will not be permitted.
- PB13 states that a policy should be provided to restrict large floor-space multiples in favour of small floor space local shops.

Other matters:

The following other matters were raised:

- The importance of affordable broadband to facilitate business
- The importance of pedestrian linkages throughout town centres, particularly Letterkenny in order to improve accessibility and strengthen town centres.

3.2.5 Chief Executive's response

The broad comments raised in the submissions are noted. The strategy of the Draft CDP endorses a collaborative and regional approach and acknowledges the potential challenges of Brexit. The requests for rezoning for economic development purposes in Muff, Manorcunningham, Milford and Ballybofey-Stranorlar are also noted and are addressed individually within the themed response on site specific zoning requests contained in section 3.12 of this report. In addition the comments in relation to the importance of improving linkages, both pedestrian and vehicular to support economic development, particularly in town centres, are noted and this is acknowledged as key enabler for growth.

Furthermore, the approach outlined in submission PB13 (An Taisce) in relation to the role of Council in land assembly will be explored through the preparation of Local Area Plans, particularly in respect of Letterkenny which is due to commence in 2018.

The economic development strategy in relation to its locational policies is aligned to the Core strategy of the plan. To this end, it recognises the undoubted link between strong performing and functioning towns and the benefits of clustering of economic development and service provision and therefore prioritises the occurrence of economic development within the county's network of towns. Through this approach economic development can be better serviced with roads, broadband, water, wastewater, pedestrian accessibility and customers can have improved access. In addition, the clustering of economic activity, including the type of industrial buildings and processes provided for under policy ED-P-3 further strengthens towns and offers significant potential for regeneration and revitalisation.

Notwithstanding, the plan recognises that the rural areas of County Donegal are living vibrant places and currently generate a significant level of economic activity and local employment. Therefore, it provides significant opportunity for new rural based economic development, particularly through ED-P-13 which provides for consideration of businesses in rural areas that (a.) could serve as a valuable addition to the local economy and/or tourism offering in an area, such as those relating to food (particularly value-added products such as artisan food), forestry (e.g. wood products), crafts, creative industries, ecotourism and agri-tourism (e.g. farmhouse accommodation, pet farms, farm holidays, health farms, equestrian activities, bird-watching holidays, painting and photography tuition, angling tourism, field studies and hill-walking) or (b.) comprise a home-based business of limited scale (circa 1-2 employees), located within the curtilage of an existing dwelling house; subject to compliance with Policy ED-P-14 and having regard to all other material planning considerations.

This approach supports sustainable rural based economic development and strikes an appropriate balance that is required in order to also protect the natural environment and landscape. In addition, this strategy would complement the County's towns and villages as it will not unduly compete with their capacity to grow sustainable economic enterprise and business.

In relation to the locational policies of the draft CDP for retail development and in particular out-of-centre developments, it is considered that the approach in the retail strategy is consistent with the Retail Planning Guidelines 2012 and therefore should be retained in the Plan. The dilution of this strategy to provide for the widespread development of out-of-centre retail developments, particularly on the edges of small towns would not be sustainable, would affect the vitality of town centres, be counter-productive to regeneration and revitalisation objectives, would potentially be out of context with the scale and function of particular towns and would not comply with the Retail Planning Guidelines 2012.

The comments of PB01 (TII) are acknowledged in relation to the location of retail development adjacent or close to existing, new or planned national roads/motorways however, it is noted that the presumption referred to in the Retail Planning Guidelines 2012 in this regard, is described as a general presumption rather than an 'explicit presumption. In any case, objective RS-O-2 outlines the requirement to ensure consistency with the Retailing Planning Guidelines 2012.

As a result, there are no recommended alterations to the Draft Plan in respect of Economic Development.

3.3 Themed response on infrastructure (roads, water, wastewater)

3.3.1 Synopsis of Chapter 5, Infrastructure

Chapter 5; Infrastructure, sets out a framework for the delivery of high quality infrastructure throughout the county in order to support the social, economic and environmentally appropriate development of Donegal and to ensure the provision of quality connectivity within the region and beyond. Particular emphasis is placed on the transportation and roads sector, water and environmental services, telecommunications and flood relief infrastructure; with a view towards catering for the ambitious population targets set out in the Core Strategy of the Plan.

3.3.2 Submissions referring to Chapter 5, Core Infrastructure

- A submission was received from the Department of Housing, Planning and Local Government (DoHPLG) in relation to Infrastructure (Ref PB 14)
- Other submissions received from prescribed bodies in relation to Infrastructure: PB01 (Transport Infrastructure Ireland), PB 02 (Heritage Council), PB09 (Inland Fisheries Ireland), PB10 (Northern and Western Regional Assembly), PB11 (EPA), PB12 (Department of Culture, Heritage and Gaeltacht; Development Applications Unit), PB13 (An Taisce), PB15 (Eirgrid), PB16 (Causeway Coast and Glens Borough Council), PB17 (ESB Business Service Centre), PB19 (Irish Water).
- Submissions received from members of the public relating to Infrastructure: P11, P19, P24, P33, P36, P42, P45, P48, P53, P93, P102, P112, P164, P205, P209, P223, P243, P250, P252, P264.
- Submissions received from Elected Representatives.

3.3.3 Summary of the issues raised in the submission made by the DoHPLG in relation to Infrastructure

The DoHPLG consider that, in broad terms, the Draft County Development Plan provides a strategic framework for the proper planning and sustainable development of the area and gives spatial expression to the economic, social, cultural and environmental aims of Council.

With specific regard to wastewater treatment infrastructure, the Department recommends that the wording of Policy WES-P-11(3), which currently allows for 'interim treatment plants', should be revised taking account of the views of Irish Water in the context of its connections policy and having regard to the extensive legacy issues surrounding such treatment plants and the inadvisability of permitting interim treatment facilities unless within an Irish Water connection agreement context.

3.3.4 Summary of the Issues Relating to Infrastructure in the Remaining Submissions

In terms of infrastructure-related policy, there are different views relating to Policy T-P-4 of Chapter 5 in particular. Transport Infrastructure Ireland (TII) notes the contents of Policy T-P-4 and is of the opinion that said policy is consistent with the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities. TII also welcome the clarification in Policy T-P-4 that development of national/regional strategic importance may be considered in 'exceptional circumstances', subject to such proposals going through a substantive consultation and evidence-gathering process involving TII. Also in relation to Policy T-P-4, An Taisce submits that said Policy should be amended to designate all roads in the Strategic Road Network (map 5.1.2) as "roads treated to national roads standards." Contrary to the foregoing, the collective submission from the Inishowen Elected Members requests that Policy T-P-4 be removed from the County Development Plan, given 'restrictions' recommended by Transport Infrastructure Ireland as national roads policy. Other cohorts of Councillors also request the removal of Policy T-P-4 on the basis that it would serve to 'kill off' developments that intensify an access onto National Roads where the speed limit exceeds 60kph. A further submission from an Elected Member in relation to Policy T-P-4 suggests revised wording for this policy, whereby 'new' accesses onto National Roads would not be permitted where the speed limit exceeds 60kph; however, where an existing 'safe' entrance exists, planning permission might be forthcoming for an individual that resides along the road in question and is proposing a new or replacement development. In terms of public submissions, two individuals have suggested that Policy T-P-4 should be relaxed to include exceptions that would permit planning permission in principle for persons that owned a site along a national road

prior to March 24th, 2000 or alternatively for farming families seeking planning permission where no other non-national road access is available.

TII have made a number of additional specific comments in relation to other policies/sections of the Draft Plan that relate to infrastructure, summarised below –

- TII recommend that Policy ED-P-14 (economic development in rural areas) should have appropriate cross reference with national road policy and in particular Policy T-P-4. Similarly, TII suggest additional national road policy cross-references at: a) Chapter 6, especially Section 6.3, Rural housing; b) Chapter 8, Natural Resource Development; c) Chapter 9, Tourism; d) Chapter 11, Community, Culture and the Gaeltacht, particularly re community uses; and e) Part B:Appendix 3 Development Guidelines and Standards.
- TII note that Policy T-P-7 refers to the Design Manual for Roads and Bridges (DMRB), which has been superseded by various TII publications.
- TII recommend consultation with Donegal NRDO to ensure that all major national roads schemes are correctly referenced in Table 5.1 of the Plan.
- TII acknowledges the CDP support for concentrating retail uses in town centres and the application of the sequential test but suggests that the 'explicit presumption' contained in the Retail Planning Guidelines against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways, should be incorporated into Chapter 4.2.
- TII note the requirement for Traffic and Transport Statements to be completed (Section 2.1 of Draft) but advises that whilst this is sufficient for minor roads, TII recommend that applications for significant development with implications for a national road should be accompanied by TTA prepared in accordance with the TII Traffic and Transport Guidelines (2014) and this should be referenced in the Plan.
- TII recommend that all references to NRA are updated to TII and that references to NRA DMRB are updated to 'TII publications'.
- TII request that the Council give consideration to including a reference in the CDP to the requirements of S.I. No. 140 of 2006, Environmental Noise Regulations.
- TII note the proposals outlined in Policy LK-T-P-3 concerning a multi-modal strategic link from Dry Arch Roundabout to the Port Road Roundabout and advises that the scheme should be developed in consultation with, and subject to the agreement of, TII.
- TII requests that development proposals on lands in Letterkenny zoned as 'General Business/Opportunity Sites' that are located in proximity to national roads would be subject to TTA requirements in accordance with TII TTA Guidelines (2014) and would welcome the inclusion of this requirement in the text.
- In Bundoran, TII acknowledges the text re. development proposals on the proposed East and West Gateway Opportunity Sites to the effect that direct access to N15 Bypass from the sites shall not be permitted. TII recommends that development proposals on these sites should be subject to TTA and that this provision is incorporated into Development Plan.
- TII consider that there is a requirement to co-ordinate proposed zoning designations and/or access strategies in the Plan with speed limits on national roads. TII notes a significant number of examples of proposed 'Settlement Envelopes' in Layer 2 and 3 that extend along national roads outside the location of reduced speed limits. TII consider that there is potential for policy conflict in this regard and suggest that there is a requirement to review the extent of settlement envelopes and development objectives to ensure compliance with official policy regarding development on/affecting national roads.
- In Bridgend, TII note the designation of a Strategic Economic Development Opportunity Site along the N13 at a location where the 100kph speed limit applies and advise that the case for any proposal for access onto the national road falling to be considered under the 'exceptional circumstances' provision should be prepared in accordance with the provisions of Section 2.6 of the Spatial Planning and National Roads Guidelines for Planning Authorities.
- TII note that there is a requirement to align 'Opportunity Sites' requiring access to national roads in accordance with Section 2.6 or 2.7 of the DoECLG Spatial Planning and National Roads Guidelines; any such proposals must be subject to detailed consultation with TII and based on a robust evidence base prior to adoption of the Plan.

The Northern and Western Regional Assembly (NWRA) largely support the transport infrastructure priorities set out in Chapter 5 of the Draft Plan but suggest the inclusion of an additional objective that facilitates infrastructural requirements that may arise as a result of Brexit. The NWRA also suggest that the Council review the Walking/Cycling section with a view to referencing Greenway links across the region and cross-border to form the basis of an all-island greenway network.

A common theme in the submissions relates to road maintenance, improvement and safety and the need for good road and traffic management is reflected both by the public and the Elected Members of the Council. Certain specific suggestions and comments are put forward in this respect, such as –

- The importance of the N2/A5 and N16/A4 road corridors for the strategic development of the region.
- The need to tarmac roads rather than tar and chip, for reasons of durability and cost.
- The need for improvements to Regional Road R250 and Regional Roads in general.
- Comments to the effect that Fintragh Bridge on the R263 is not suitable for large/long vehicles; a consideration that could lead to road closures and undue delays in the event of emergencies.
- The need to incorporate a much greater emphasis on pedestrian and cycle safety and to make provision for the development of walking and cycling strategies and coastal path routes.
- The need to pass bye-laws prohibiting the erection of commercial signage at road junctions and commercial signs that appear similar to road signs.
- The need to maintain roadside verges.
- The need to renovate footpaths in Pettigo and provide new paths in Carrick.
- The need to adopt a 'gentle approach' to the provision of footpaths and streetlights, as it is important to safeguard 'dark skies'.
- The provision of new 60kph speed limits in Kilmacrennan village.
- The provision of a car park at the cycling track where it commences in Illistrin.
- A review of speed limit signage in Carrick and Kilcar and the introduction of a rule whereby two speed limit signs can only be provided in areas where the road is of a certain width.
- The provision of 1 bus shelter in every rural town and at least 6 wheelchair accessible spaces in each town also.
- A submission from an Elected Member suggests that now would be an appropriate time to put in place a selection process for routes between Mountain Top to Killylastin and Mountain Top to Lisnennan to provide for future growth in these areas.

Water and wastewater infrastructure is another common theme raised in the submissions. The Irish Water submission outlines the objective of Irish Water to provide both drinking water and wastewater infrastructure capacity to meet the domestic requirements of the settlements and Core Strategies of development plans. The submission contains information on future Capital Investment Projects (CIP) and water and waste water status in towns in Layer 1, 2A and 2B as a supplement to the information contained in table 2.4, Part A of the Draft CDP.

With direct reference to Irish Water projects, Councillors have raised concerns that Irish Water are refusing to take over standalone treatment systems, thereby putting the emphasis on developers to set up management companies for the maintenance of such infrastructure. Others note that many towns in Donegal are at capacity in terms of wastewater treatment and query how the Council envisages development proceeding in these towns in the future, particularly when Irish Water control the investment programme for such infrastructure.

Also with regard to wastewater treatment, the Northern and Western Regional Assembly suggest re-consideration of the provisions for interim solutions to wastewater treatment for multiple developments (Policy WES-P-11) where capacity does not exist and in consultation with appropriate bodies (IW, EPA), given experience of legacy issues (as noted above, the Department of Housing, Planning and Local Government have made similar comments on this subject).

Councillors also request clarification in respect of Policy WES-P-11(3.)(b)(i.), in particular the extent to which a developer installing a wastewater treatment plant must cater for *existing* development in the area in addition to the proposed and already approved development in the vicinity. An assessment or analysis was requested of the 62 towns listed in the CDP settlement structure, in terms of which of these settlements have adequate infrastructure in place at the present time to allow the granting and

development of an additional 10 dwellings. Members have also noted that the Council must continue to work with Irish Water to progress the development of sewer networks in smaller towns and villages and to proceed with sewer extensions where needed.

One public submission raises the issue of the deficiencies in sewerage infrastructure serving residential developments in Burnfoot and Bridgend, and contends that there is a need for a robust water and wastewater service strategy for the wider Bridgend and environs area and a clear strategy for the delivery of infrastructure in the Birdstown area in general.

The EPA note that all proposed infrastructural developments should be implemented in accordance with the requirements of the EIA, Habitats and Water Framework Directives and that the implications of climate change and seismic activity should be taken into account. The EPA welcomes the Council's commitment to support and facilitate Irish Water in the timely delivery of infrastructure.

An Taisce suggest that it should be a specific objective of the CDP to deliver suitable locations for serviced sites and note that the Planning Authority must maintain and improve investment in public transport, walking, and cycling in order to offer communities viable alternatives to private cars. An Taisce submit that the CDP should include a section entitled Green Infrastructure, modelled on the content of the Fingal County Development Plan 2010 – 2016 (Chapter 3). The importance of walking and cycling routes, provision of greenway infrastructure and coastal walks etc. is also evident from the public submissions.

The lack of an adequate broadband service in the county also emerges as a theme in the public submissions; with 20% of respondents citing this issue as a concern.

In a submission regarding the electricity transmission network, Eirgrid advise that they published Ireland's Grid Development Strategy, 'Your Grid', in 2017 and this supersedes Grid25. Eirgrid therefore request that all references to Grid25 be replaced with the most up to date strategy 2017. Eirgrid Support the Aim in Chapter 8.2 to facilitate appropriate energy infrastructure and further support the general objectives and policies outlined in section 8.2.2 and 8.2.3 of the Draft Plan. Regarding Policy E-P-9, EirGrid understands the principle to protect areas of scenic amenity by seeking 'to ensure, where practical, that power lines be routed underground' but contend that undergrounding can have other significant environmental effects. Eirgrid request a re-wording of Policy E-P-9.

The ESB submission, inter alia, states that provisions must be made to accommodate the ongoing performance enhancement, redevelopment and strengthening of existing utilities infrastructure at their current locations and notes that the County Development Plan should maintain policies to protect future capacity for the development of energy infrastructure. Regarding telecommunications, the submission welcomes the ICT policy set out in section 5.3, particularly policy TC-P-3, which requires the co-location of new or replacement antennae and dishes on existing masts unless a thoroughly documented case can be made for proceeding otherwise.

One submission from a member of the public notes the value of Letterkenny Airfield to the town in terms of practical, business and tourism benefits and asks that the Council consider the Airfield as part of infrastructural improvements throughout the county.

Two public submissions refer to the ferry services in the county; in particular the importance of the Greencastle to Magilligan ferry service and the Rathmullan-Buncrana service. Also on this theme, Councillors request that Policy T-P-22 (relating to Magheroarty, Burtonport and Greencastle) be given the same status as Policy T-P-20 (relating to Killybegs), in support of the Council's funding application for Greencastle.

3.3.5 Chief Executive's response:

The Draft County Development Plan as presented to Councillors represents a robust framework that identifies the infrastructural priorities for the County and, by extension, for the Region. The remediation of the infrastructural deficit in national infrastructural networks (for example, National Roads, broadband, power grids, water/sewer networks, and maritime infrastructure) forms the foundation for the approach in the Draft Plan and is a context that underpins the importance of delivering on the key road linkages based on the Ten-T routes that transect the county and link with regionally important all-island networks.

As a consequence of this strategic approach, the recommended amendments below amount to a strengthening of the infrastructure policy framework already set out in the Draft Plan.

The comments made in relation to infrastructural provision for waste water treatment in many of the County's settlements presents a particular challenge for the County, to Irish Water and to other stakeholders. The clear premise contained in the Draft plan is to avoid a repetition of development patterns of previous years where development and infrastructural provision was not delivered as hoped. Instead the Draft Plan, as did the 2012-2018 County Development Plan, requires the prioritisation of multiple development where there is capacity in the public infrastructure to cater for the demand. It is not proposed to materially alter this approach but to continue to get working resolutions to the legacy of unfinished estates within the county, particularly those that present particular waste water treatment issues, and to work in partnership with all stakeholders including Irish Water. The Council will, in tandem with this work, actively investigate other sustainable options for the sustainable development and servicing of the towns and villages in the county including where appropriate the development of serviced sites to meet local housing demand.

The Draft Plan indicates a number of locations where it is intended to seek derogations from National Roads policy for strategically important junctions to be developed. While identified within the scope of the Draft Plan it is intended that the consultation and justification for such 'exceptional circumstances' would be properly provided for within the relevant Local Area Plans.

The submission of Transport Infrastructure Ireland references a number of matters relating to Letterkenny or to the larger towns in the county that are the subject of specific local area plan programmes. Where such issues arise, these will be addressed through the individual local area plan process for each respective settlement.

The issue of new entrances and the intensification of existing entrances have been debated extensively. New entrances to the National Road network are assessed and guided by National Road Policy in the context of the S.28 guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)* and relate to development affecting national roads, outside the 50-60 km/h speed limit zones for urban areas, where the efficiency, capacity and safety of the national road network is maintained. In this regard the Draft Plan provides a clear framework for meeting obligations set out by national policy and sustainably guiding the spatial distribution of development across the County and, consequently, no amendments to policy are recommended.

There are a number of non-material amendments arising from the submissions relating to Infrastructure that are recommended below. These largely relate to policy cross-references and clarifications that can form minor edits to the document.

In support of all-island initiatives relating to walking and cycling infrastructural provision, the comments of the Northern & Western Regional Assembly encouraging a wider referencing of the importance of regional and cross-border greenway networks are incorporated into specific amendments proposed below to the policies set out in chapter 5.

A number of submissions related to operational matters associated with the maintenance and development of the road network in the county. These matters will be raised as operational matters of note with the Roads Directorate.

The ferry links serving the county are explicitly supported by the Draft Plan as are the facilities and services provided at the main ports. The development context and potential of these ports is strategically set out in Policies T-P-20 & T-P-22 in a manner that supports their future development and potential needs.

With regard to Rights of Way as identified in Table 18 of Appendix 3 and the accompanying Map 01 of Appendix 3, it is considered that the level of detail provided is sufficient for the County Development Plan, which is a strategic level spatial planning document.

With regard to public comments concerning the value of Letterkenny airfield, DCC recognises the valuable role played by the Airfield and its contribution to the social and economic life of Letterkenny and indeed the wider region.

TII comments regarding references to the former NRA (National Roads Authority) in the Draft Plan are noted - it will be necessary to update all such references to refer to TII documentation / publications. TII references to the 'general presumption' against large out-of-town retail centres, in particular those located adjacent or close to existing, new or planned national roads, are acknowledged. It is an explicit objective of the Draft Plan (Objective RS-O-2) 'to ensure consistency with the retailing objectives... of the Retail Planning Guidelines 2012' and in this respect the Planning Authority would fully consider the potential impacts of any retail proposal on the strategic road network.

TII's recommendation that applications for significant development with implications for a national road should be accompanied by a Traffic and Transport Assessment are acknowledged and are already addressed under Policy T-P-8 of the Draft Plan, which states that 'It is a policy of the Council to require a Traffic and Transport Assessment and Road Safety Audit for any development proposing access to the Strategic Road Network.'

With regard to the issue of the extent of settlement envelopes in relation to speed limits, as referred to by TII; the Planning Authority will implement Policy T-P-4 of the Plan to control development accessing onto the strategic road network where the speed limit is greater than 60 kph, unless exceptional circumstances that permit a deviation from Policy T-P-4 have been identified in consultation with TII.

The provision of high quality broadband infrastructure continues to be a priority for the Council and the Draft County Development Plan sets out a clear policy basis to support the delivery of this essential infrastructure -

- Objective TC-O-1 'To facilitate the development and delivery of a sustainable telecommunications network across the County through a range of telecommunication systems, developed with due regard to natural and built heritage and to environmental considerations.
- Objective TC-O-2 'To support and facilitate the deployment of the National Broadband Plan the National subvention plan to deliver High Speed Broadband to every rural household outside the commercially served areas as defined on the National Broadband Plan Map and similar projects, subject to the proper planning and sustainable development of the area.

The comments of Eirgrid in terms of the publication of the grid development strategy 'Your Grid' 2017 are noted - all references to the now outdated *Grid 25* in the Draft Plan shall be updated to reflect the title of new development strategy.

3.3.6 Recommendations

Recommendation 1:

It is recommended to carry out the following minor edits and non-material amendments as follows:

Item	Amendment
(a)	To amend Objective T-O-13, Chapter 5, (Infrastructure) of the Draft Plan so that it reads as follows: (New text shown in blue and text to be deleted shown in strikethrough) T-O-13: To support the development of new walkways, walking routes, trails and cycleways that maximise the potential for local, regional and all-island walking and cycling networks.
(b)	To amend Policy T-P-7, Chapter 5, (Infrastructure) of the Draft Plan so that it reads as follows: (new text shown in blue, text to be deleted shown in strikethrough) T-P-7: It is the policy of the council to require that any new access to a strategic road is designed in compliance with the National Roads Authority's Design Manual for Roads and Bridges (DMRB) road design standards required by Transport Infrastructure Ireland, avoiding the use of right turn lanes unless a clear warrant has been established.
(c)	To amend Table 2.4 (Chapter 2) to reflect updated information provided by Irish Water in respect of water and wastewater capacity in Layer 2B settlements. (Updated table 2.4 is contained in Appendix B of this report)
	To amend Footnote 22, Chapter 8, (Natural Resource Development) of the Draft Plan so that it reads as follows: (new text shown in blue) ²² "Your Grid", Ireland's Grid Development Strategy 2017
	To amend all references to the National Roads Authority (NRA) to refer instead to Transport Infrastructure Ireland (TII).

3.4 Themed response on flood risk

3.4.1 Synopsis of the section of the Draft Plan

Section 5.4 of Chapter 5 of the Draft CDP provides the policy framework for the County in relation to flooding. It aims to manage development proposals within flood risk areas in a sequential manner based on avoidance, substitution, justification and mitigation and to otherwise ensure that flood risks can be managed to an acceptable level without increasing flood risk elsewhere. The chapter references the 'Planning System and Flood Risk Management Guidelines for Planning Authorities,' 2009.

3.4.2 Submissions referring to flood risk

- A submission was/received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to flood risk. (Ref PB 14)
- Other submissions received from prescribed bodies: PB 09 (Inland Fisheries Ireland), PB10 (NWRA), PB11 (EPA), PB12 (DoCHG, Development Applications Unit), PB18 (OPW).
- Submissions received from members of the public: P73, P93, P158, P200, P211, P217, P220, P268, P284 (Late).

3.4.3 Summary of the issues raised in the submission made by the DoPHLG in relation to flood risk

The submission of DoPHLG in relation to flood risk states that provision should be made for a clearly articulated link between the CFRAM programme and the Development Plan objectives in order to ensure full clarity and transparency. The DOHPLG furthermore state that a comprehensive Stage 2 Strategic Flood Risk Assessment (SFRA) is required to be completed and that any recommendations stemming from the SFRA should be integrated into the Draft Plan and there should be a clear correlation between the SFRA, the Development Plan written statement and any zoning maps. The submission also outlines that the SFRA should map boundaries for Flood Zone Areas A, B and C and should ensure incompatible development does not occur with Flood Zones A and B. The submission strongly recommends that any zoning identified in Flood Zone A and B is amended to water compatible use. DOHPLG also refer to any other issues raised separately in the OPW submission and advise that those recommendations should also be addressed.

3.4.4 Summary of the issues in the remaining submissions

The remaining submissions reiterate the importance of an appropriate policy response to flood risk and generally recognise measures set out in the section 5.4 of the Draft CDP to minimise flood events together with the referencing in the Draft Plan to the 'Planning System and Flood Risk Management Guidelines for Planning Authorities,' 2009. The NWRA reference the Flood Risk Management Guidelines and suggest that the section 28 statement should be reviewed in relation to these Guidelines.

The submissions of the prescribed bodies, in particular the OPW and also public submission P268 (on behalf of Tesco Ireland) reflect the comments of DoHPLG including stating that the Draft Flood Risk Management Plans of the CFRAM programme do not constitute a Strategic Flood Risk Assessment (SFRA) and to this end, recommend that a stage 2 SFRA should be prepared together with mapping of flood zones A, B and C. The most detailed comments are made by OPW, setting out the process to be undertaken in relation to SFRA and outlining the planning principles to be employed in zoning of land in relation to the sequential approach to managing flood risk, the application of the justification test and the precautionary principle. The OPW submission in particular, states that evidence should be provided in relation to residential zoning decisions especially where there is potential flood risk to areas identified and in this regard it cites a number of examples at Letterkenny (OPP-P-6 to OPP-P-9), Buncrana (BC-ED-P-11) and Bundoran (in relation to areas within the residential phase 2). OPW state that the justification test is the best tool to outline the criterion met as part of the SFRA.

A number of public submissions, although commenting primarily on wind energy development and its associated policy, reference the importance of amenity areas, woodlands, uplands and boglands as

natural reservoirs and as forming part of the drainage network and therefore recommended that such areas are protected from development in order to safeguard against flooding.

3.4.5 Chief Executive's Response

The comments of the prescribed bodies and public submission in relation to flood risk are noted including the comments that the Draft Flood Risk Management Plans through the CFRAM programme do not constitute a Strategic Flood Risk Assessment (SFRA). As a result, the need for the preparation of County level SFRA is acknowledged as an essential component of the Plan and this is particularly important having regard to the extent of the most recent flood event during August 2017. It is noted however, that the policy framework provided through section 5.4 of Chapter 5 sets out a clear and sequential approach to managing flood risk through the development management process and in itself is considered to comply with the approach set out in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities,' 2009. Thus far, the plan preparation process has utilised the best available data in relation to the probability and extent of flood risk in the form of the Draft Flood Risk Management Plans of the CFRAM programme which are referenced in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities,' 2009 as the prime information source where they have been prepared.

For clarity, Appendix A of the 'Planning System and Flood Risk Management Guidelines for Planning Authorities,' 2009, sets out the purpose of a SFRA in respect of a County Development Plan and the stages in relation to the preparation of it. Broadly, Flood Risk Assessments (FRA) aim to identify, quantify and communicate the risk of flooding to land, property and people by providing sufficient information to determine whether particular actions (such as zoning of land for development) are appropriate.

Flood Risk Assessments (FRA) are typically undertaken over a number of stages as set out in Figure 3.4.1 with the need for progression to a more detailed stage dependant on the outcomes of the former stage. An assessment at County level is initially based on existing information by presenting flood risk information using flood risk indicators. Flood risk indicators compile a range of information sources on flood risk such as historic incidents, floodplain or flood zone extents as a proportion of urban areas, sensitivity to climate change impacts or areas defended by barriers or storage reservoirs.

Figure 3.4.1: The stages in SFRA

Stage 1 Flood Risk Identification	This stage is the process for identifying whether a plan or project requires a FRA and is essentially a desktop exercise based on existing information. If there is a potential flood risk issue, it is necessary to move to stage 2.
Stage 2 Initial Flood Risk Assessment	The purpose of an Initial FRA is to ensure that all relevant flood risk issues are assessed in relation to decisions to be made and potential conflicts between flood risk and development are also addressed to an appropriate level. It assesses the adequacy of existing information and identifies whether further studies are required. The Initial FRA will determine whether more detailed assessment is needed in areas of significant conflict between flood risk and development.
Stage 3 Detailed Flood Risk Assessment	Where a proposed area of possible zoning may be subject to significant flood risk, a Detailed Flood Risk Assessment must be carried out. It normally involves some form of mathematical modelling of river systems and it is characterised by: <ul style="list-style-type: none"> (i) Assessing existing flood risk in terms of the likelihood of flooding and resultant consequences; and (ii) Assessing the potential, post-development risks having regard to the design of mitigation and compensation measures.

Having regard to the submissions made in relation to flood risk and the process for SFRA set out in the 'Planning System and Flood Risk Management Guidelines for Planning Authorities,' 2009, work has now commenced in-house on the preparation of a stage 1 SFRA and this will lead to clarification of the appropriate locations for which a Stage 2 (Initial Flood Risk Assessment) is required together with the appropriate mechanisms to deliver it. The target for completion and circulation to Members of a Stage 1 report is prior to the plenary meeting of Donegal County Council on 27th November so that the report is

considered in conjunction with the Chief Executive's Report on the submissions received (i.e. this report) and the Draft CDP. The Stage 1 SFRA report may include recommendations for particular amendments to the Draft Plan and the Environmental Report that would be material alterations such as evidentially based and clearly required rezoning or adjustment to appropriate land uses at particular locations of mixed use zonings.

As outlined in the themed response on Core Strategy and Housing (section 3.1 of this report), detailed work is both underway and planned in relation to a programme of Local Area Plans. It is likely that where the Stage 1 SFRA report identifies a requirement to proceed to stage 2, the mechanism for delivery of the relevant Stage 2 assessment will be within the context of the relevant Local Area Plan and will involve engagement of external expertise. Figure 3.4.2 sets this potential process out in more detail.

Figure 3.4.2: Potential mechanisms for delivery of relevant stage 2 assessments

Location	Potential mechanism for delivery in the event of identified need for stage 2
Letterkenny, Bunrana and Bundoran	Through a planned LAP programme commencing January 2018. Particular sites in each town may require an interim and immediate position to be taken to amend zoning or specified land uses within mixed use zones as part of the material alterations to the Draft CDP for reason that specified flood risk is already clear and significantly evidenced at Stage 1 and is at variance with national policy.
7 Towns covered by the draft LAP (An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Ballyshannon, Bridgend, Carndonagh, Donegal Town, Killybegs)	Through the ongoing Draft LAP programme and to be targeted for preparation immediately but at least during the consultation period of the draft LAP so that potential amendments arising can be considered through the CE Report as material alterations to the Draft LAP.
Others	Clarity on the scale of need for stage 2 assessment will be available when the stage 1 assessment is complete and will be linked to the locations of land use zoning.

3.4.6 Recommendations

Recommendation 1:

That as an interim measure, a Stage 1 SFRA be prepared and resultant proposed amendments be presented to Members prior to the plenary meeting of Donegal County Council on 27th November 2017 for consideration in conjunction with the 'Chief Executive's Report on submissions received in respect of the Draft County Donegal Development Plan 2018-2024' and the Draft CDP.

3.5 Themed response on rural housing

3.5.1 Synopsis of Chapter 6, Section 6.3, Rural Housing

Section 6.3 of the Draft Plan, Rural Housing; sets out the Councils policies and objectives in terms of meeting the genuine rural housing needs of communities, in line with the Government's Sustainable Rural Housing Guidelines for Planning Authorities (2005).

3.5.2 Submissions referring to Chapter 6, Section 6.3, Rural Housing

- A submission was received from the Department of Housing, Planning and Local Government (DoHPLG) in relation to, inter alia, Rural Housing (Ref PB 14)
- Other submissions received from prescribed bodies in relation to Rural Housing: PB13 (An Taisce) .
- Submissions received from members of the public relating to Rural Housing: PB05, PB09, PB38, PB55, PB56, PB66, PB74, PB90, PB114, PB174, PB175, PB206, PB212, PB223, PB248, PB258, PB265, PB283.
- Submissions received from Elected Representatives in relation to Rural Housing: LR1, LR2.

3.5.3 Summary of the issues raised in the submission made by the DoHPLG in relation to Rural Housing

The DoHPLG consider that, in broad terms, the Draft County Development Plan provides a strategic framework for the proper planning and sustainable development of the area and gives spatial expression to the economic, social, cultural and environmental aims of Council.

With regard to rural housing, the Department states that the Planning Authority should ensure that the County Development Plan is consistent with the approach laid out in Circular letter PL 2/2017 on Sustainable Rural Housing Guidelines for Planning Authorities 2005 - Local Needs criteria in Development Plans.

3.5.4 Summary of the Issues Relating to Rural Housing in the Remaining Submissions

The majority of the public submissions in relation to rural housing (11 No. submissions in total) express a desire for rural housing policy that allows local people to build in their home areas.

A number of Elected Members have requested that only policies RH-P-1, RH-P-2 and RH-P-6 be adopted in relation to rural housing. The Councillors have also suggested –

- That a person living within a settlement should be allowed to build for a distance of 5 miles outside of the relevant town.
- That the wording used in Point 5 of Policy RH-P-2 in the current CDP be used rather than Policy RH-P-11, i.e. that holiday home developments in EHSA areas should be acceptable in principle subject to appropriate siting etc.
- That the exclusion on holiday home development in 'Stronger Rural Areas' and 'Structurally Weak Rural Areas' (as set out under Policies RH-P-3 and RH-P-4) should be removed. One public submission also supports the call to remove holiday home restrictions in 'Structurally Weak' areas.

In addition to the foregoing, a number of Members have concerns that the policy in relation to 'ribbon development' is not working and that said policy is open to differences of opinion when it comes to interpretation. These Councillors have requested that policy in relation to ribbon development be re-written to allow for assessment of applications on a case-by-case basis and that guidance should be provided in relation to the term 'suburban and piecemeal development'.

The design criteria for one-off housing has been raised by one member of the public, who cites concerns that design stipulations are restricting growth in rural areas. Another member of the public suggests that planning fees for 'local people' should be waived and that holiday homes should either be occupied all year round or otherwise be subject to a charge of €50,000 at planning stage.

One member of the public suggests that favourable consideration should be given to sites that have previously had the benefit of planning permission and that consideration should be given to allowing rural housing within 1 mile of community services such as schools, churches etc. It is further suggested that the definition of 'immediate family members' should be expanded to include 'cousins' and that 'Areas Under Strong Urban Influence' should be opened up to allow returning emigrants to construct rural housing.

An Taisce submit that the recommendations of the EPA report *Sustainable Rural Development: Managing Housing in the Countryside 2010* (starting on page 272) should be incorporated directly into the County Development Plan.

With regard to rural areas of the Gaeltacht, Conradh na Gaeilge suggest that a language impact assessment should be requested for all applications in Gaeltacht areas and that multi-unit developments should be bound by occupancy and linguistic requirements. It is suggested that a household whose head has a level C1 in the European certificate in Irish should be considered as having a genuine local housing need.

3.5.5 Chief Executive's response

The rural housing policies set out in the Draft County Development Plan 2018-2024 have been prepared in accordance with all relevant guidance, in particular the Government's Sustainable Rural Housing Guidelines for Planning Authorities (2005). With reference to An Taisce's submission, much of the thinking contained in the EPA report '*Sustainable Rural Development: Managing Housing in the Countryside*' has already been brought to bear in the formulation of the Draft Plan.

The policies in the Draft adopt a largely similar approach to new permanent housing in the countryside as is currently in place in the CDP 2012-2018 (as varied) and the Planning Authority would note that the overall number of public submissions in respect of this issue is relatively low (18 public submissions referencing rural housing in total), suggesting that the approach taken is catering effectively for rural housing need.

The focus of the rural housing policy in the Draft Plan is on ensuring that genuine rural housing needs are provided for, whilst also having regard to the need to protect the environmental qualities and scenic amenities of the County and comply with all relevant technical standards, including traffic safety considerations and public health standards.

The Sustainable Rural Housing Guidelines are clear in requiring that Planning Authorities -

- (a.) Ensure that the housing needs of local communities are identified in the Development Plan and;
- (b.) Manage pressure for overspill development from urban areas in the rural areas closest to the main towns.

Policies RH-P-3 to RH-P-5 have therefore been drafted to provide for the genuine housing needs of rural communities whilst at the same time distinguishing between areas that are subject to differing levels of pressure for new one-off housing development, in accordance with the provisions of the Government guidelines. It is considered that the rural housing policies of the Draft Plan offer a balanced and reasonable approach towards the provision of new housing development in the countryside and at the same time serve to protect the rural character and landscapes of the County.

In terms of rural holiday home development, the Draft Plan offers opportunities for the development of up to 5 units as part of a farm diversification plan and for the development of holiday homes comprising part of a 'resource related tourism project' (Policy RH-P-11), save within areas identified as being of 'Especially High Scenic Amenity'. Thus, the Draft Plan does allow for rural holiday home development in appropriate circumstances and where such development would also serve to bolster the local economy. With regard to new 'one-off' holiday home development, a rationale was provided in the Draft Plan regarding (a.) the short term benefit to the local economy provided by such development, (b.) the potential that such development can affect the ability of members of the local community to acquire affordable sites for themselves and (c.) the extent of residential vacancy in the County. For these

reasons it was considered that the most appropriate course of action in terms of one-off holiday home provision in the countryside is to pursue the re-use of existing housing stock and the refurbishment of existing buildings. It is not recommended to deviate from the approach in the Draft Plan.

With regard to issues raised in relation to 'ribbon development', the Planning Authority would note that the definition of this development pattern as set out in Section 6.3.3 of the Draft Plan is based on the guidance contained in Appendix 4 of the Government's Sustainable Rural Housing Guidelines. Whilst having regard to the Guidelines, the appraisal contained in the Draft Plan provides for greater flexibility of interpretation and has included wording that allows for physical and geographical breaks (inclusive of topography) to be taken into consideration when assessing whether a proposal would contribute towards ribbon development, or the degree to which a proposal might form part of a small cluster of development as opposed to a 'ribbon' or linear pattern. Thus, the wording of policy as set out in the Draft Plan allows for a very practical and commonsense approach to the assessment of 'ribbon development', allowing for those 'infill' sites and clustered development opportunities whilst at the same time ensuring that the amenities of our rural areas are protected, particularly those areas on the fringes of towns and villages.

With regard to design criteria for rural housing, the aim is to promote good practice and ensure that new buildings integrate as effectively as possible into the rural environment. However, a prescriptive approach in relation to design is not suggested and this is clearly stated in Section 4.0, Appendix 4, Part B of the Draft Plan: 'Building a House in Rural Donegal - A Location, Siting and Design Guide', wherein it is acknowledged that site conditions and contexts vary widely across the County and thus result in differing design solutions. The Planning Department continues to offer 'pre-planning' clinics where prospective applicants can obtain advice in relation to appropriate rural house design in Donegal.

With regard to potential impacts that new housing may have on the linguistic heritage of an area, the Draft Plan has had due regard to such impacts and policies in relation to 'language impact assessment', and occupancy requirements pertaining to language proficiency are set out under Urban Housing Section 6.2.3, Policy UB-P-20.

Consideration of the issues in relation to rural housing must now have regard to the contents of Circular Letter PL2/2017, which issued on 31st May 2017 and which advises (a.) that a Working Group has been established at a national level to review and, where necessary, recommend changes to the 2005 Guidelines arising from the 'Flemish Decree' case and the judgement of the European Court of Justice in this regard and (b.) that the forthcoming National Planning Framework will further assist in informing the revision of the 2005 Guidelines; hence the rural housing policies of the County Development Plan are likely to be subject to variation following the publication of the new Rural Housing Planning Guidelines and will be the subject of further debate at that time.

As a result, there are no recommended alterations to the Draft Plan in respect of Rural Housing.

3.6 Themed response on natural and built heritage and the environment

3.6.1 Synopsis of the Section of the Draft Plan

Chapter 7, The Natural and Built Heritage, outlines the framework to conserve, protect and enhance the County's natural, built and cultural heritage for future generations and encourage appreciation, access and enjoyment of these resources.

Natural Heritage

Section 7.1 of the Draft CDP acknowledges the importance of conserving, protecting and managing the County's Natural Heritage whilst engendering positive growth which is important in terms of sustaining biodiversity for the purpose of enjoyment, education, research and maintaining healthy ecosystems.

The Draft Plan notes a large number of national and international important ecological sites and species that are offered protection through European and Irish legislation as well as Ireland's obligations as a signatory to the International Ramsar Convention on the conservation and wise use of wetlands.

Ireland's ratification of the Council of Europe's European Landscape Convention, provides further context and has led to the preparation of a Landscape Character Assessment (LCA) for Donegal (first stage in the process), endorsed by the members of Donegal County Council in May 2016; The landscape 'Types' and 'Landscape Character Areas' are available on Donegal County Council's website www.donegalcoco.ie. The Draft CDP provides a policy context to build on the evidential approach of the LCA.

Built Heritage

Section 7.2 of the Draft CDP outlines policies and objectives to preserve, protect and enhance the Built Heritage of the County. The County has a rich and diverse architectural, environmental, built, archaeological, cultural and built heritage that informs our identity, teaches us lessons from the past and brings economic and social benefits to the region through its scenic landscapes, vernacular architecture and historic monuments.

The Planning and Development Act 2000-2017 (P&D Acts) sets out the requirements of County Development Plans to protect architectural, historical, archaeological, artistic, cultural, scientific and technical structures of special interest including, for example, 467 Protected Structures in County Donegal.

Section 7.2 (Built Heritage) has been prepared having regard to the guidelines in relation to Architectural Heritage Protection and the guidelines in relation to Architectural Heritage Protection for Places of Public Worship. The objectives and policies of Chapter 7 and the relevant chapters for towns in Part C of the Draft Plan, provide for the protection and conservation of buildings listed on the Record of Protected Structures (listed in Part B, Appendix 3), buildings identified on the NIAH, ACA in Letterkenny and streetscape protection in Buncrana.

3.6.2 Submissions referring to the Natural and Built Heritage including Impacts on the Environment

- A submission was not received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to The Natural and Built Heritage.
- Other submission received from Prescribed Bodies: PB02 (Heritage Council); PB05 (Geoheritage Programme, Department of Communications, Climate Action & Environment, Geological Survey of Ireland); PB07 (Fáilte Ireland); PB08 (Northern Ireland Environment Agency); PB10 (Northern and Western regional Assembly); PB12 (Department of Culture, Heritage and Gaeltacht); PB13 (An Taisce); PB15 (Eirgrid) and PB16 (Causeway Coast and Glens Borough Council).
- Submissions received from members of the Public: P02; P06; P19; P30; P33; P36; P41; P47; P54; P62; P63; P70; P73; P80; P84; P87; P98; P99; P102; P108; P112; P117; P118; P119; P120; P121; P122; P123; P124; P125; P126; P127; P128; P129; P130; P131; P132; P132; P133; P134; P135; P136; P137; P138; P139; P140; P141; P142; P143; P144; P145; P146; P147; P148; P149; P158;

P164; P173; P192; P193; P196; P197; P198; P199; P200 P207; P211; P213; P221; P225; P234; P245; P256; P260; P262; P266; P278 (late); P281 (late) and P283 (late).

- Submission received from Elected Representatives: LR1 (Inishowen Elected Members) and LR2 (Fianna Fáil Grouping).

3.6.3 Summary of the issues raised in the submission made by the DoPHLG in relation to The Natural and Built Heritage

The submission from the Department of Planning, Housing and Local Government (DoPHLG) did not specifically refer to the Natural and Built Heritage or potential impacts on the Environment.

3.6.4 Summary of the issues in the remaining submissions

The submission by the Heritage Council makes a number of observations in relation to Natural Heritage in particular in relation to the inclusion of 'effective landscape planning and management' as a priority in the Core Strategy and makes several suggestions in this regard including: the inclusion of effective landscape planning and management as a strategic objective in Chapter 1 of the CDP; the inclusion of the European Landscape Convention's definition of landscape in the Plan, as per S4(c) of the Planning and Development Acts; and the inclusion of the National Landscape Strategy 2015-2025 as part of policy context along in Chapter 7 of the CDP. The Heritage Council commends the Landscape Character Assessment (LCA), and would support further work on detailed Historic Landscape Assessment and heritage-led regeneration of towns including use of 'Town Centre Health Checks' and would be keen to collaborate with DCC and other partners.

The submission by the Northern & Western Regional Assembly welcomes the focus of the Draft Plan on the heritage assets of the County, noting that Donegal is a significant national asset in this regard.

The submission by the Geoheritage Programme, Department of Communications, Climate Action & Environment, Geological Survey of Ireland) requests that Policy NH-P-19 (p 117) in Chapter 7 be amended to include the following wording "*...and the Geological Survey should be consulted...*".

The submission by Fáilte Ireland is comprehensive and extensive and provides a broad overview that is generally supportive of the Draft Plan. The submission is generally positive and provides both commentary on the Draft Plan and proposed changes with suggested text to a number of policies/objectives. The following is a list of all suggested changes to the Natural, Built and Archaeological Heritage Objectives and Policies contained in Chapter 7 of the Draft Plan:

- Natural Heritage Objectives NH-O-1 to NH-O-11

Good general objectives for Natural Heritage. Given the importance of the scenic landscape to the tourism industry and as an attraction to County Donegal, these objectives would benefit from the inclusion of references to tourism / visitors.

- Natural Heritage Policies NH-P-1 to NH-P- 20

Good general policies for Natural Heritage. Given the importance of the scenic landscape to the tourism industry and as an attraction to County Donegal, these policies would benefit from the inclusion of references to tourism / visitors.

- Built Heritage Objectives BH-O-1 to BH-O-4

Good general objectives in relation to Built Heritage. Reference to heritage tourism in BH-O-4 welcome.

- Insert New Built Heritage Objective after BH-O-2

"To work with stakeholders including the OPW, the Heritage Council, the Arts Council, Fáilte Ireland, National Parks and Wildlife Services, Coillte, local communities and businesses to support the development of heritage and cultural tourism in County Donegal".

- Insert New Built Heritage Objective after BH-O-5

"To Favourably consider proposals for tourism and recreation development, which involve the reinstatement, conservation and / or replacement of existing disused buildings, and to adopt a positive interpretation of plan policies to encourage such development".

- Built Heritage Policies BH-P-1 to BH-P-18

Good general policies in relation to built heritage. Would benefit from additional references to tourism / visitors.

- Built Heritage BH-P-3 to BH-P5

Good policies in relation to vernacular buildings. May benefit from rewording or inclusion of text as follows: *"Recognise the importance of the contribution of vernacular to the attraction of a place to live, work and visit, and to provide clear guidelines and interpretations of plan policies to promote where feasible the protection, retention and appropriate revitalisation and use of vernacular built heritage, including structures that contribute to the landscape and streetscape character and discourage the demolition of these structures."*

- Insert new Built Heritage Policy:

"Encourage and support the provision of foreign language interpretation interventions in order to ensure the appropriate interpretation and appreciation of the county's heritage asset."

- Archaeological Heritage Policies AH-P-1 to AH-P-8

Good general policies on archaeological heritage. Would benefit from the inclusion of references to tourism/visitors.

- Insert new Archaeological Heritage Policy after AH-P-8

"Promote and develop important archaeological heritage sites as cultural and tourism resources; in all cases, the applicant must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability, as defined herein."

The submission by Northern Ireland Environment Agency suggests that Policy NH-P-1 and NH-P- 2 on p115 of Chapter 7 of the Draft CDP should clarify that this includes those features where there is a likelihood of development impacting a European site on both sides of the border.

The submission by the Department of Culture, Heritage and Gaeltacht (DoCHG) Development Applications Unit makes a number of observations in relation to Natural Heritage, the SEA/AA processes, the Environmental Report and the Natura Impact Report. While there is some degree of overlap in the issues raised in the submission, only those specifically relating to Natural Heritage are responded to in this section of the Report and the remaining issues are responded to in the Themed Response for the Environmental Report and the Natura Impact Report in Section 3.11.

The observations by the DoCHG in relation to Natural Heritage can be summarised as follows:

- The submission states that the overall CDP would benefit from review and technical input in relation to European sites, NHAs and Appropriate Assessment matters and terminology, particularly, but not exclusively, in Chapter 7, Section 7.1.
- The DoCHG notes that there are references to the need to comply with the Habitats Directive in some objectives, and not in others, and consider that this could be taken to mean that such matters will arise in the case of the former and not in the latter. It is recommended that, if future compliance of plans and projects (with the Directive) is used as a mitigation measure, then there should be clearer and more consistent wording, cross-referencing or use of footnotes in each of the relevant objectives. The above type of mitigation should also be reviewed or expanded, where necessary, to cover the full range of considerations that may apply; e.g. reference to the Birds Directive, the EIA Directive, the SEA directive and relevant national legislation.
- There are inconsistencies in the approach taken and references to Natural Heritage in Part C – e.g. Chapter 12 Letterkenny, Section 12.5.1 Natural and Built Heritage, Chapter 13 Buncrana Section 13.5.1 Chapter 14 Bundoran Section 15.5.1
- The DoCHG notes text in the Plan documentation including but not limited to Part A (Appendix 1) and the Environmental Report which suggests that the terms 'NIR' and 'appropriate assessment' are synonymous. Clarity is required as to what is actually meant by each of these phrases

- Within the objectives and policies included in Chapters 1 and 2 there are numerous mentions of "relevant environmental designations" and other examples throughout the Plan of the use of certain terms that refer or could refer to natural heritage where the definition is unclear (e.g. "natural habitats" in Chapter 8, Section 8.1 Aim). Clarity is required as to what is actually meant by each of these phrases.

An Taisce make a number of observations in relation to the Natural and Built Heritage which can be summarised as follows:

- The most significant demesnes and designed landscape in the County should be identified and planning policies applied to maintain and enhance their special character and significance.
- The CDP should seek to designate more ACAs and Special Planning Control Schemes.
- S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.
- The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.
- The CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law, particularly with regard to the Habitats Directive.
- The policy recommendations of the National Biodiversity Plan 2017-2021 should be fully incorporated into the CDP.
- The Draft CDP fails to address the implications of Brexit for the natural environment, especially with regard to the Transboundary character of the Natura 2000 network.

The submission by Eirgrid states that it carefully plans its routes and sites for new transmission grid infrastructure based on a careful consideration of a wide range of issues including:

- Avoiding areas of high amenity value, like AONBs, where possible and deviating around areas of lesser amenity value;
- Avoiding known ecologically sensitive areas (SACs, SPAs, ASSIs, etc.);
- Integrating lines within the landscape using, amongst other things, the natural background and foreground features to visually absorb the support structures (e.g. hills, forests, vegetation, etc.);
- Minimising disturbance to current land use and farming practices;
- Minimising the number of crossings of other power lines, railway lines and roads; and
- Avoiding sharp changes in direction to minimise the number of towers.

The submission by the Causeway Coast and Glens Borough Council states that it generally agrees with the content of the Draft CDP. In relation to Part A and B of the Plan, the submission welcomes the references to Northern Ireland and the Causeway Coast and Glens Borough area throughout the Plan including the natural and built heritage policies.

The submissions from the public have a number of reoccurring themes in relation to the Natural and Built Heritage and potential impacts on the environment which can be broadly categorised under the following headings:

Landscape Designations

There are conflicting opinions arising in the public submissions in relation to the proposed Landscape designations in the Draft CDP. A number of submissions support designations acknowledging the importance of protecting the County's landscape, in particular areas of Especially High Scenic Amenity (EHSAs), from intrusive and unsympathetic development. In this regard support for the designation in the Draft CDP of the Cruit Island shoreline as EHSA as well as at Belcuit/Kincasslough/Gortnasade/Keadue is noted and the inclusion of Loughros Point, in particular the islands. However, consideration has been given to the views back from the islands in this context (NH-P-6 & NH-P-7).

Similarly, there are a number of submissions which raise concerns in relation to the Landscape designations outlined in the Draft CDP questioning the rationale for the proposed changes to the landscape amenity designations in the Draft CDP. For example, certain submissions are concerned that the extension of EHSA areas and the introduction of 'High Scenic' and 'Moderately Scenic' amenity areas has significant implications for future wind energy development in the County. They query the fact that the Landscape Character Assessment (adopted in May 2016) did not make recommendations in respect

of landscape designations, yet the Draft CDP incorporates significant changes to such designations. It is noted that detailed landscape reviews (inclusive of mapping) has been submitted by members of the public, suggesting mapping amendments to EHSA areas, area of high scenic amenity and areas of moderate scenic amenity. There is a specific request that the land (submission provides photographs but no map) between An Grianan Of Aileach and the main road between Burt Chapel and St Marys Hall be designated as an area of 'Especially High Scenic Amenity'.

The submissions raise specific concerns in relation to expansion of EHSA along the coast and state that the designation has been proposed without due consideration of the nature of the coastline and its current level of development. In general, the submissions do not agree that the coastline falls within the EHSA definition. In this regard it is noted that the coastal extension of EHSAs appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. Concerns are raised that such designation will restrict economic development in rural coastal locations and thus fail to support sustainable communities in these locations. The submissions contend that many of the areas designated under the Draft CDP do not fit with the definition of such areas in the existing Plan and as such seek clarification on whether there has been a change in definition of EHSAs in the Draft CDP. The submissions request the Council to consider creating a greater mosaic of EHSA and High Scenic Amenity (HSA) in line with the approach taken in County Kerry for example.

A number of submissions query the discrepancies between amenity designations and wind energy designations in the Draft CDP and suggests this demonstrates a lack of correlation between the designations. In addition, the submissions raise concerns regarding the 'protected views' identified on Map 7.1.1 and the associated Policy NH-P-13. It is noted that views are not numbered or described in the text and suggestion is made that this should be done in the interests of clarity.

Natura 2000 Network

There are conflicting opinions arising in the public submissions in relation to the protection of the Natura 2000 Network of European sites. Some of the submissions recognise the importance of protecting the European sites (including SACs, SPAs, and NHAs) specifically referencing SACs and SPAs in the Finn Valley and Cashelnavern areas and particular species such as Hen Harriers. While other submissions refer to the onus on farmers carrying out works in these areas (where planning permission is required) to provide a Natura Impact Statement for works carried out within the Natura 2000 Network and the unfair financial cost. The submissions request that Donegal County Council assist farmers with any financial cost in these planning applications and seek to have them reimbursed by the Department of Culture, Heritage and Gaeltacht.

Freshwater Pearl Mussels

There are also conflicting opinions arising in the public submissions in relation to Freshwater Pearl Mussels (FPM) principally in the context of wind energy. A number of submissions raise concerns over the potential 'blanket ban' on development caused by the protection afforded to Freshwater Pearl Mussels (FPM) in the Draft CDP which is perceived by some to prevent wind farm developments. These are addressed in the themed response on Renewable Energy & Natural Resources.

Invasive Species

A number of submissions raise concerns in relation to the problems arising from invasive species and most notably the Council's approach to the eradication of all invasive species in the County. In this regard it is suggested that a systematic programme based on international best practice be drawn up. It is further suggested that an objective of eradication of invasive plant species is included into the Plan.

The submissions also note that farmers should be made aware of their obligations under regulation 49-50 of the European Communities (Bird and Natural Habitats) Regulations 2011 in relation to the prohibition and dispersal of certain species (Regulation 49) and prohibition on dealing in and keeping certain species (Regulation 50). It is also suggested that the presence or proximity of Japanese Knotweed should be a material consideration in the assessment of planning applications and that

additional training should be provided to Council staff in order to adequately deal with such applications.

Other submissions raise the serious issue of the invasive shrub Rhododendron (Ponticum) and state that Donegal is especially affected given its acidic soil and bog areas. The submissions request that the Council raise this issue with other relevant statutory agencies and include a policy on this matter in the County Development Plan to halt the further spread of Rhododendron and ultimately eradicate the species.

Water Environment

A number of submissions highlight broad based environmental changes taking place at both local and national level, such as 'the loss or degradation of once pristine blue flag beaches (i.e. Lisfannon)', the reduction in numbers of returning wild salmon and the destruction of fish stocks in our rivers. The submissions notes that, at County level, the CDP could make a positive contribution to such environmental issues by introducing changes to improve our coastal angling tourism potential, aid seafood production and encourage self sustaining diversification.

River Pollution

A number of submissions cite international and national examples in relation to global environmental issues and suggest a number of ways to combat the growing problems. They specifically refer to the environmental impacts of river pollution, householder pollution, global livestock market, methane reduction in agriculture, electric vehicles, timber for power generating, EU quotas and agricultural policies, renewable energy, depleting ocean stocks, national fish industry, land-based fish farming and the marine industry.

Woodlands

A number of submissions raise concerns regarding the protection of designated Woodlands in the CDP for the enjoyment of future generations in particular Dunwiley Woods and Drumboe Woods. These considerations will be addressed under the relevant Local Area Plan process.

Trees, Stone Walls and Hedgerows

In general, the submissions are supportive of the Draft CDP in terms of its content on trees, stone walls and hedgerows and suggest hedgerows and field boundaries should be monitored in order to protect them. Similarly, green lines (hedges, verges, trees) are considered important wildlife corridors and should be maintained and improved.

The submissions suggest the following amendments to the Natural Heritage Objectives and Policies in relation to the protection trees, stone walls and hedgerows:

- It is suggested that Objective NH-O-8 should be re-worded as follows (suggested text coloured blue)- *"To ensure where appropriate the protection and conservation of hedgerows, stone walls and traditional field boundaries as natural heritage corridors and migration routes for wildlife where they are shown to play a significant heritage role. If the removal of such features is necessary, appropriate replacement hedgerow or stonewalls should be provided, if possible, within the application site"*.
- It is suggested that Policy NH-P-10 should be re-worded as follows (suggested text coloured blue) - *"It is a policy of the Council to retain and protect significant stands of existing trees/hedgerows/woodlands, and seek increased planting of native trees where appropriate in new developments. Where the removal of trees/hedgerows/woodlands is unavoidable, replacement trees should be provided, if possible, within the application site"*.
- It is suggested that Policy NH-P-11 should be re-worded as follows (suggested text coloured blue and deleted text shown in strikethrough)- *"It is a policy of the Council to seek the protection of stone wall boundaries where they are shown to play a significant heritage role. Where the demolition of such stone walls is unavoidable, the ~~reinstatement of stone walls at revised location/set back within the site using agreed local materials and techniques, will be required.~~ should be reinstated, if possible, at revised location/set back within the site using agreed local materials and techniques."*

Protection of Archaeological Heritage

A number of submissions note the importance of protecting our natural and archaeological heritage and landscape. In this regard it is suggested that the CDP would benefit from structural and format changes across a number of chapters in the Plan and suggests opportunities including to integrate the importance of walking, cycling, recreation, green infrastructure, rural tourism, eco-tourism, agri-tourism and woodland areas; visual impact of development on amenity value; protection of views and prospects; protection of archaeological resources; development of networks of open space; integration of landscape character assessment; protection of designated conservation sites; potential and protection of inland waterways; the protection of Glenveagh National Park; the designation of the Blue Stack Mountains as a National Park or Special Amenity Area and the potential development of Geo-Parks. A further submission suggests that the Bavin (Bavan)/Shalvey/Croaghbeg area should be accorded special Heritage Status in view of its landscape character, archaeology and history.

Built Heritage

In general the submissions are supportive of the policies and objectives to preserve, protect and enhance the Built Heritage of the County. The submissions raise a number of issues in relation to Built Heritage, some of which are quite local in nature, which can be summarised as follows:

- Support is acknowledged for Policy BH-P-11 regarding the built heritage of the islands as these landscapes present a piece of the nation's heritage and should be protected. It is submitted that the character of these places is being eroded and retention of buildings and streetscapes need promotion through the CDP. In this regard it is suggested that the Council should consider extension of ACAs to the islands that have unique architectural character e.g. Inishboffin, Owey, Gola, Inishoirrer and Inishmean. It is also stated that the Council fulfil their obligations under the DCHG Architectural Protection Guidelines for Planning Authorities in full, part IV of the Planning and Development Acts.
- Concerns raised that some heritage buildings are not identified by NIAH and therefore not protected. It is submitted that old homesteads including ruins (vernacular architecture), stone bridges, culverts, parapets and stone walls should be retained and protected.
- The submissions note that practical support should be made available to owners of the remaining thatched cottages in the County so that the remaining examples of this important part of our built heritage can be retained. It is acknowledged that the thatched cottage also has an economic value from a tourism perspective.
- The identification of Glenties as a strategic town in the Draft CDP is welcome, however it is suggested that in addition it should also be identified in relation to its (i) Built and archaeological heritage and (ii) sport and recreation and (iii) the culturally and politically important MacGill Summer School/ proximity to the Laurels.
- The heritage value of Ardara should be considered in any land use planning decisions having regard to RMP maps and known archaeological sites.
- Kilcar town should be accorded Heritage Town status by virtue of its long established tweed and knitwear industry and close proximity to sites of archaeological and historical importance. All of these sites are popular with tourists and also of tourist value including: the scenic coastline, game fishing, beaches local piers, views of Sliabh Liag and from the coast road to Carrick.

One of the submission raises concerns over the lack of protection of our Coastal Heritage which can be summarised as follows:

- Concerns raised over the lack of protection of coastal heritage and the built heritage in coastal locations which should be enshrined in the Development Plan.
- Large areas of coastal landscape have been destroyed by holiday homes and other developments in coastal locations.
- The submission cites examples where coastal heritage has been destroyed by developments including the Coastal Defence Fort and Artillery Barracks in Greencastle, and Northburgh Castle. The submissions claim that the re-development of some buildings of coastal heritage is being allowed at the detriment to locals and tourists alike; specific reference is made to the redevelopment of the artillery barracks part of the Greencastle fort complex to facilitate holiday home developments.
- The submissions further claim that conditions attached to planning permissions are not enforced properly by the Council.

- The submission claims that the protection of the coastal heritage is left to the Public to police through the objections and appeals citing an example in Moville in relation to a public pathway along the seafront.

Amendments to Specific Policies

A number of submissions request the Council to amend the wording of specific policies in Chapter 7 of the CDP, including the following: (NB: New text shown in blue)

- Policy NH-P-20 should be amended to include address of Cró na mBraonain Red Grouse Sanctuary, Achla Mt, Fintown.
- Policy NH-P-6 should be amended as follows "*It is a policy of the Council to protect areas identified as Especially High Scenic Amenity on Map 7.1.1: 'Scenic Amenity'. Within these areas, only developments assessed to be of strategic importance **except for excluding wind farm development or developments that are provided for by policy elsewhere in this Plan and can demonstrate avoidance of adverse impact on scenic amenity shall be considered.***"
- Policy NH-P-15 be amended as follows "*It is a policy of the Council to safeguard prominent skylines and ridgelines **from all development.***"

In relation to Archaeological Heritage, it is submitted that national policy/guidance does not appear to address the concept of the 'setting' of a monument and it is suggested that, in certain policies relating to archaeological heritage protection, reference to 'setting/character' should be removed as follows (NB: deleted text shown in strikethrough):

- Policy AH-P-1: "*It is a policy of the Council to protect and enhance the integrity of **Archaeological Monuments** ~~and their settings~~ and to secure the preservation in-situ of all archaeological monuments included on the Record of Monuments and Places. Preservation by record shall only be considered in exceptional circumstances where the principles of the Department of Arts, Heritage, Gaeltacht and the Islands publication entitled, 'Framework and Principles for the Protection of Archaeological Heritage' can be satisfied.*"
- Policy AH-P-3: "*It is the policy of the Council to protect ~~the character, settings of and views from~~ National Monuments and Recorded Monuments and to manage development which would be considered to ~~(visually or physically) intrude upon or inhibit the enjoyment of the amenities of these sites.~~*"
- Policy AH-P-4: "*It is the policy of the Council to protect where appropriate, ~~the character and setting of~~ any unrecorded archaeological object or site.*"
- Policy AH-P-5: "*It is the policy of the Council to protect and preserve archaeological sites, ~~their characters and settings~~ which have been identified subsequent to the publication of the Record of Monument and Places.*"

The submissions by the Elected Representatives generally relate to local issues affecting their constituencies. With specific reference to the Natural and Built Heritage and the environment in general the submissions from the Elected Representatives can be summarised as follows:

- a request that areas of EHSA should remain with same wording as previous Plan with no policy restriction or recommendation.
- a submission requests more co-operation and an ongoing dialogue with the planners regarding the implementation of policy and state that due to the different physical and cultural landscape within the county that one policy does not fit all and that pearl mussels only be in the plan 'IF' they are needed and if so policies should be restricted to the river basin areas only. The submission also requests that that the owners of all NIAH structures be provided with information on these structures in the context of policies BH-P-1 and BH-P-18.

3.6.5 Chief Executive's response

The submissions by the Prescribed Bodies are generally supportive and provide a comprehensive and extensive overview of the policies and objectives contained in Chapter 7 (The Natural and Built Heritage) of the Draft CDP. For the most part, the observations are well considered and appropriate but do not result in recommendations for material alterations to the Draft Plan, such as the inclusion of definitions in relation to the landscape and environmental designations, updated policy context in relation to the Landscape (Section 7.1) and other minor changes to text and/or objectives/policies.

Where the suggested amendments were considered appropriate they have either been included as non-material changes to the Environmental Report or as recommended in Section 3.6.6.

In response to the submission by the Heritage Council it is noted that there is some overlap in the issues raised between Chapter 2 (Core Strategy) and Chapter 7 of the CDP and as such these issues have been addressed in the Themed Response on Core Strategy in Section 3.1 of this Report. It is acknowledged that there is merit in including the European Landscape Convention's definition of landscape in the Plan, as per S4(c) of the Planning and Development Acts and information on the National Landscape Strategy 2015-2025 as part of policy context in Section 7.1 of the CDP. The support from the Heritage Council in relation to the Landscape Character Assessment is also noted.

The submission by Fáilte Ireland provides a comprehensive and extensive overview of Chapter 7 of the CDP. Whilst the suggested amendments to the objectives and policies are extensive, it is considered that the majority of these can be incorporated into the Plan (where deemed necessary) without giving rise to any material changes or direction of emphasis in the document.

The concerns of Northern Ireland Environment Agency in relation to the wording of Policies NH-P-1 and NH-P- 2 in Chapter 7 of the CDP are acknowledged, it is not proposed to make the suggested changes within the Draft Plan. Notwithstanding this, it is noted that a review of and suggested changes to the strategic Environmental Objectives, in Chapter 8 of the Environmental Report (Part D of the CDP) have been recommended as non-material changes to clarify the transboundary obligations in relation to the protection of the Natura 2000 network of sites. This is addressed in further detail under the Themed Response on the Environmental report and the Natura impact Report in Section 3.11.

The Department of Culture, Heritage and Gaeltacht (DoCHG) Development Applications Unit provides a very detailed review of the policies and objectives in Chapter 7 of the Draft CDP. It is acknowledged that there is merit in including the a glossary of terminology in relation to the Natura 2000 network of sites and text in relation to the AA and SEA processes in Section 7.1 of Chapter 7 of the CDP. Whilst the suggested amendments to the objectives and policies are extensive, it is considered that the majority of these can be incorporated into the Plan (where deemed necessary) without giving rise to any material changes or direction of emphasis in the document.

In response to the concerns raised by An Taisce it important to reiterate the Council's commitment to the conservation, protection, and enhancement of its built environment including buildings and other structures such as bridges, archaeological sites and field boundaries. The County contains a stock of architectural heritage including many large country houses and their associated demesne landscapes, ecclesiastical sites and other sites of industrial and vernacular heritage. The CDP recognises that while not every structure is of sufficient importance to warrant the rigours of special protection, the conservation of good examples of the cultural and built heritage is vital if a sense of continuity with the past is to be maintained. The Draft CDP has been prepared having regard to the requirements of the Planning and Development Acts 2000-2017 (P&D Acts) and the Architectural Heritage Protection Guidelines for Planning Authorities to protect architectural, historical, archaeological, artistic, cultural, scientific and technical structures of special interest. Furthermore, the Record of Protected Structures for the County was updated in 2017 and there are now 467 Protected Structures in County Donegal. In addition, 2,277 structures of architectural heritage value have been identified on the National Inventory of Architectural Heritage (NIAH) survey for County Donegal. [Note: The NIAH survey includes those structures on the RPS list]. It is important to note that the RPS and the NIAH are iterative processes which are continually updated. It is further noted that the Council's existing Development Contribution Scheme provides for an exemption from the S.48 development levies for Record of Protected Structures, where such works substantially contribute to the restoration or protection of the RPS (N.B. A 50% reduction shall apply to extensions to the existing footprint of RPS buildings).

An Taisce suggest that the CDP should seek to designate more Architectural Conservation Areas (ACAs) and Special Planning Control Areas. In this regard, it is noted that there are two proposed ACAs identified in the Draft CDP one in Bundoran and one in Letterkenny. In addition, areas of 'Special Townscape Character' have been identified as part of the Local Area Plan process for Ballyshannon, Donegal Town and Killybegs having regard to the extent of built heritage in these towns. Furthermore,

it is worth noting that the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs has identified seven 'Historic Towns', within the County, for general protection namely, Ballyshannon, Donegal Town, Killybegs, Lifford, Ramelton, Rathmullen and St. Johnston. Furthermore, in 2000, Donegal County Council designated five 'Heritage Towns' namely, Ardara, Ballyshannon, Moville, Ramelton and Raphoe. Having regard to the level of protection afforded the built heritage under the Draft CDP it is not intended to designate any more ACAs as part of the development plan process. Notwithstanding this, it is noted that additional ACAs will be considered under the future Local Area Plan processes for Letterkenny, Bunrana and Bundoran.

The comments by An Taisce in relation to the potential impacts of Brexit are acknowledged. Notwithstanding this, explicit assumptions cannot be made in the Draft Plan regarding the potential treatment of the natural environment, especially with regard to the Transboundary nature of the Natura 2000 network of sites. Any potential impacts that may arise once the EU issue a direction on the future status of trans-boundary Natura 2000 sites will be addressed as required.

In general, the submissions from the public recognise the importance of conserving, protecting and enhancing the County's natural, built and cultural heritage for future generations albeit as long as it does not prevent economic growth or marginalise rural communities. A response under each of the categories raised in the public submissions is provided below.

Landscape Designations

The contrasting views in relation to the protection of our landscape are noted. Many of these concerns were expressed in relation to wind energy and aquaculture respectively and are therefore considered in the sections of this report on Renewable Energy and Natural Resources, and Marine respectively. In broad terms the landscape designations were reviewed in detail during preparation of this Draft Plan using available data and objective assessment.

Natura 2000 Network

The aim of the Natural Heritage strategy as outlined in Chapter 7 of the Draft CDP is to conserve, protect and manage the County's natural heritage for future generations and encourage appreciation and enjoyment of these resources. The Draft CDP recognises the European and National value of the Natura 2000 network, and also the requirement under the Habitats Directive (92/43/EEC) to protect the habitats of important species including those in the wider countryside outside designated areas. It sets out the role of Article 6 of the Habitats Directive in requiring the protection of the designated species and habitats of Natura 2000 sites, and explicitly states that any plan or project with the potential to impact on the conservation objectives of designated sites is required to take appropriate steps to avoid the deterioration of natural habitats and the habitats of species as well as significant disturbance of species for which areas have been designated and will be subject to Appropriate Assessment. The requirement to comply with Article 6 of the Habitats Directive is an explicit objective of the Natural Heritage strategy.

Freshwater Pearl Mussels

The Freshwater Pearl Mussel (FPM) and the associated catchments have attracted a lot of interest in recent years due to its interesting ecology, life cycle, ability to produce pearls and, most importantly, its decline which has left the species in danger of extinction. FPM is protected under the Wildlife Acts, 1976 and 2000 and Annex V of the Habitats Directive. The European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009 sets environmental quality objectives for FPM habitats, and requires the production of sub-basin plans with programmes of measures to achieve these objectives. It sets out responsibilities of public authorities in terms of sub-basin plan implementation. FPM Sub-Basin Management Plans have been prepared for the six Natura designated FPM in the County. These Sub-Basin Management Plans sit alongside the River Basin Management Plans (RBMPs) to provide a detailed programme of measures to improve the habitat of the FPM so that it can attain favourable conservation status. It is noted that the objectives and policies in Chapter 7 of the Draft CDP have been prepared having regard to the requirements under the aforementioned legislation.

Invasive Species

Invasive species represent a threat to biodiversity. It is noted that the control of invasive species is specifically provided for in the following objectives and policies in the Draft CDP including NH-O-1, NH-P-2 and NH-P-5 and furthermore that the Council is committed to adopting a proactive approach to the spread of invasive species including undertaking a 4 year Invasive Alien Plant Species (Knotweed) Treatment Programme on public roads around the County.

In addition, Transport Infrastructure Ireland (TII) introduced an eradication programme on selected national roads in 2016 and they plan to treat knotweed infestations along entire routes and Donegal will be included in the first routes to be treated. This programme will run in parallel with Donegal County Councils treatment programme on non-national roads.

Water Environment

Donegal's marine resource is of major importance to tourism and leisure activities, and is a fundamental part of our natural and cultural heritage. It is an objective of the Plan to safeguard and improve the health of Donegal's Marine ecosystem by protecting the qualifying habitat and species of Natura 2000 sites through Appropriate Assessment of development proposals; maintaining and improving water quality in estuaries and seas by implementing RBMPs and any future programmes under the Marine Strategy Framework Directive; ensuring sufficient sewage treatment capacity to serve development in urban areas, adequate on-site effluent treatment to EPA standards for developments in rural/un-serviced areas, and adequate pollution control measures for commercial/industrial development. It is a policy of the Council to ensure that development proposals do not adversely compromise the environmental quality of coastal areas including Blue Flag Beaches, Natura 2000 sites and areas of Especially High Scenic Amenity.

River Pollution

A number 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, as well as a wider spectrum of habitats and species of significance in order to maintain biodiversity in general.

Trees, Stone Walls and Hedgerows

The built environment refers to all features built by man in the environment including buildings and other structures such as bridges, archaeological sites and field boundaries. Stone walls and hedgerow in particular are an integral part of our rural/demesne landscape, often providing significant historic reference of landownership and farming patterns, and contributing to the character of areas. The Draft CDP includes specific policies for the protection of this resource.

Protection of Archaeological Heritage

The Draft CDP includes a number of proactive objectives and policies for the protection of the County's archaeological heritage.

Built Heritage

In response to the concerns raised by the public it is important to reiterate the Council's commitment to the conservation, protection, and enhancement of its built environment including buildings and other structures such as bridges, archaeological sites and field boundaries. The Draft Plan contains a number of proactive objectives and policies to protect the built heritage in the County. This has been prepared having regard to the requirements of the Planning and Development Act 2000-2017 (P&D Acts). It is important to note that the RPS and the NIAH are iterative processes which are continually updated.

Amendments to Specific Policies

It is considered that constraints to prevent environmental impact on the natural and built heritage are adequately referenced throughout many of the objectives and policies of the Draft CDP. 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. Account has been taken of the potential for environmental impact throughout the iterative process of plan development and this has guided the drafting of policies and objectives.

In summary it is noted that some 27 of the objectives and policies set out in the Draft CDP, including those in Chapter 7, 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 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.

3.6.6 Recommendations

Recommendation 1:

It is recommended to carry out the following minor edits and non-material amendments to the Chapter 7 of the CDP.

Item	Amendment
(a)	Include the European Landscape Convention's definition of landscape in the Plan, as per S4(c) of the Planning and Development Acts in Section 7.1 of Chapter 7 of the CDP.
(b)	Include information in relation to the National Landscape Strategy 2015-2025 as part of policy context along in Section 7.1 of Chapter 7 of the CDP.
(c)	Update Section 7.2.1 of Chapter 7 of the CDP in relation to the RPS having regard to the recently completed work.
(d)	Include a glossary of terminology in relation to the Natura 2000 network of sites and background information in relation to the AA and SEA processes in Section 7.1 of Chapter 7 of the CDP.

3.7 Themed response on renewable energy

3.7.1 Introduction

This section deals with renewable energy, and particularly wind energy, in light of the weight of submissions on that particular aspect of renewable energy. The section is divided into two parts, Part A and Part B. Part A addressed the issue on a broad basis, whilst Part B deals with site specific issues raised in the consultation process.

PART A: GENERAL ISSUES

3.7.2 Synopsis of Chapter 8 Relating to Wind Energy

Wind Energy is principally addressed at two sections of the Draft Plan. Section 8.2: 'Energy' addresses the broader topic of Energy and a sub-section dealing specifically with Wind Energy is contained therein. This subsection references the broad European and national corporate policy agenda, and also the additional context provided at the Irish regional planning level. The narrative goes on to note the benefits of Donegal's North-West Atlantic coast location, as a wind energy resource, that this has already been harnessed to a significant degree, that Donegal already generates significant wind energy, and has become an energy exporter. Further aspects of context are itemised including the Wind Energy Guidelines (2006) along with various aspects of the evidence base used to assist in the formulation of policy. The sub-section concludes with the text identification of the three policy areas for consideration of proposed new developments namely areas 'Open to Consideration', 'Acceptable for Augmentation', and 'Not Acceptable'. These areas are identified on Map 8.2.1; 'Wind Energy'. Wind Energy is further provided for in Sub-Section 6 (Wind Energy) of Part B, Appendix 3, 'Development Guidelines and Technical Standards'. This sub-section contains a range of factors to be considered in the preparation and assessment of planning applications, together with a set of specific requirements and standards to be met by such developments including bullet (f): 'set back distance of ten times tip height of proposed turbines from residential properties and other centres of human habitation.'

3.7.3 Submissions referring to Wind Energy

- A submission was received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to Wind Energy. (Ref PB 14)
- Other submission received from prescribed bodies: e.g. PB06 (Fermanagh & Omagh District Council), PB07 (Failte Ireland), PB08 (Northern Ireland Environment Agency), PB09 (Inland Fisheries Ireland – Ballyshannon), PB11 (EPA), PB13 (An Taisce), PB14 (Department of Housing, Planning and Local Government), PB16 (Causeway Coast and Glens Borough Council), PB17 (ESB Business Service Centre)
- Submissions received from members of the public: P19, P21, P23, P26, P28, P32, P33, P37, P49, P52, P58, P59, P64, P65, P68, P69, P71, P86, P87, P88, P93, P97, P100, P102, P107, P108, P112, P113, P115, P153, P160, P161, P162, P163, P165, P166, P167, P168, P169, P170, P171, P173, P179, P180, P181, P182, P183, P184, P185, P186, P187, P188, P190, P191, P196, P198, P199, P200, P201, P203, P204, P207, P210, P213, P214, P215, P217, P218, P219, P220, P221, P222, P223, P224, P225, P226, P227, P230, P237, P238, P239, P240, P247, P249, P251, P253, P254, P255, P256, P257, P267, P269, P271, P272, P274, P275, P276, P277, P279, P280, P282,
- Submission received from Elected Representatives: LR3

3.7.4 Summary of the issues raised in the submission made by the DoHPLG in relation to Renewable energy

The Department refers firstly to the requirement under Section 10(2)(n) of the Planning & Development Acts that planning authorities shall include an objective for the promotion of measures in the Development Plan that would mitigate against climate change and reduce reliance on fossil fuels. He then sets out the key aspects of legislation and national planning guidelines of relevance to wind energy planning policy formulation.

The submission then references the publication of the National Mitigation Plan (July 2017) noting its publication 'since the Draft Plan was prepared', and the associated statutory guidelines to planning authorities on procedural aspects of addressing the Mitigation Plan in the renewable energy aspects of their statutory development plans ('Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change', July 2017, issued under Section 28 of the P&D Acts, Circular PL 05-2017, 3rd August, 2017 refers).

In respect of these Guidelines, the Department notes firstly that: 'These Interim Guidelines focus on administrative procedures which should be carried out by planning authorities pending finalisation of revised wind energy development guidelines', and that the Interim Guidelines do not replace or amend the existing Guidelines. Secondly, the Department advises that the Interim Guidelines also contain Specific Planning Policy Requirements that, in making, reviewing or amending the Development Plan: 'the relevant Planning Authority shall:

1. Acknowledge and document national policy on renewable energy;
2. Indicate how implementation of the Plan will contribute to realising overall national targets on renewable energy (particularlry in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines) .

The Department also notes that 'it shall be a material consideration in strategic environmental assessment if a new or varied mandatory setback proposal would create a significant limitation or constraint on renewable energy projects including wind turbines in the authority's administrative area.' It then goes on to assess the contents of the Draft Plan against the above-noted statutory and policy framework and makes a number of important observations as set out below.

Set-Back Distance of Ten Times Tip Height

The Department refers to Part B: Appendix 3 Development Guidelines and Technical Standards, Wind Energy, Section 6.5 and the stipulation therein that: 'A set-back distance of ten times the tip height of the proposed turbines from residential properties and other centres of human habitation' is required. The Department goes on to note that:

- *'The practical effect....significantly and adversely restricts the potential for wind energy development within County Donegal, conflicts with the policies and objectives of the Draft Plan, (and) with national and regional objectives...to the extent that if replicated by other local authorities, would prevent Ireland from meeting its binding EU and international obligations in diversifying its energy mix and moving away from a reliance on fossil fuels.'*
- As the set back distance is included as a technical standard and not a policy or objective, it has not been assessed against the scope of the Strategic Environmental Assessment prepared in respect of the Draft Plan.

The Department concludes with the following recommendation(s) made *'In view of significant developments in government policy regarding Climate Change Mitigation and the aforementioned wind energy guidelines'*:

- *'your authority is requested to significantly revisit relevant policies with regard to the statutory obligations under Section 10(2)(n) of the Act and the associated obligations to maximise each local authority's contribution to developing renewable energy sources without the inclusion of random or poorly evidence based setback restrictions.'*

- *'policies and Technical Standards..shall be reviewed to comply with the requirements of the aforementioned Interim Guidelines and the SEA shall include an environmental assessment of the technical requirements relating to wind energy developments..'*

3.7.5 Summary of the issues in the remaining submissions

Given the volume of submissions received on this issue, and the level of detail contained in many of these submissions, this section is considered under three sub-headings: Prescribed Bodies; Public and Elected Representatives; and Industry.

Prescribed Bodies

The key issue raised in several of the Prescribed Bodies submission is the need to consider the renewable energy issue in the context of the climate change and decarbonization agenda. These submissions question the consistency or otherwise of the Draft Plan in this regard with national policy as contained in the Wind Energy Guidelines (2006); the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change', July 2017, and Circular PL 05/2017; and the National Mitigation Plan (July, 2017).

Public Submissions

Twelve submissions were received in which general observations were made in respect of wind energy. Seven of these were broadly supportive of the industry, and five were broadly opposed to it.

A total of 43 submissions addressed the policy framework contained in the Draft Plan. Of these, 36 (including the Finn Valley Wind Action Group, Inishowen Wind Energy Action Group and Glenties Wind Action Group) expressed strong support for the policy framework and the majority of these referenced their support for the contents of Variation No. 2 and, in particular, the ten times tip height set-back criterion contained in Section 10.6.5. The reasons given by this cohort for their position included concerns around the impact of such developments on: (1.) humans (including issues around visual impact, noise [including infrasound], shadow flicker, general health and safety, and impact on 'community'); and (2.) nature (including ecology, wildlife, peat slippage, the carbon sink and water storage roles of boglands)

Seven individuals' submissions expressed opposition to the overly-restrictive nature of the Draft Plan, as they would see it.

Many of the aforementioned 43 submissions also commented on, and therefore are also counted as forming part of, the twenty-three submissions that expressed strong opposition to any wind farm development in the Carrickaduff area largely located in the Finn Valley area (ie. the area of the strategic infrastructure development planning application previously refused by An Bord Pleanála). Concerns raised were largely as per those itemised above.

One submission was received asking that 'no more windmills are erected in Glenfin, especially the Three Tops/Cearc area.

Finally, proposals were received from either private individuals, groups of private individuals, or community groups either proposing, or supporting, 10 windfarm developments at 10 different locations inclusive of suggesting amendments to the Wind Energy Map.

Industry Submissions

A total of 20 submissions were received either from industry operators or professional advisors on their behalf. The overriding opinion expressed in these submissions is one of strong opposition to the contents of this part of the Draft Plan. In overall terms, they stress the need for the issue of renewable energy, and wind energy in particular, to be considered in the context of both national policy, legal obligations on climate change, national planning policy and legislation, as well as regional planning policy. Furthermore, it is suggested that inadequate weight has been given to the national economic and local economic and community benefits to be derived from the wind energy sector. In doing so, these submissions identify major differences between national policy provisions and guidance and the contents of the Draft Plan and conclude that the policies are not only contrary to national policy, but

that they would also effectively eliminate future wind development in the County. Several submissions include calculations concluding that around 1.5% of the County would be realistically open to consideration when the combined effects of the zoning map and 10 times tip height setback are considered cumulatively. The submissions also question how the Council can justify such departures from national policy and included amongst these questions are further concerns around the legality of this approach. Questions are also asked as to the veracity of the evidence base used to justify the departures from national policy, and the extent to which the objectives and policies were assessed in the environmental assessment process. In this context, the industry submissions make a number of substantive suggestions/recommendations for changes to, and omission of, a number of key policies.

The submissions stress the international and national policy context and the emphasis therein on climate change and the need for reduction of reliance on fossil fuels/decarbonization, particularly in light of concerns around the security of energy supply. Under Directive 2009/28/EC Ireland is legally obliged to ensure that by 2020, at least 16% of all energy consumed in the state is from renewable sources.

Reference is also made to the Paris Agreement (2015), the first international climate agreement concluded by 195 countries adopted at the United Nations in December, 2015. This Agreement re-affirms international commitment to addressing climate change and was formally ratified by Ireland in October, 2016 and came into force in November, 2016.

As well as international commitments and legal obligations, the submissions also advise in great detail of national policy to promote the development of renewable and indigenous energy sources; and to minimise carbon emissions and greenhouse gases. The Government's Energy White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' provides a complete energy update and framework to guide national policy up to 2030 and re-affirms the commitment of the Government in achieving targets outlined in previous policy instruments, namely:

- 40% of gross electricity consumption to come from renewable sources;
- 12% of thermal energy to come from renewable sources.

A range of other policy documents that address the climate change agenda are also cited including, notably, the National Mitigation Plan.

The submissions argue that various provisions in the Draft Plan constitute complete departures from national and regional planning policy. Documents referred to in this case include the Wind Energy Guidelines, 2006 (and associated Circular PL 20-13); Interim Guidelines August, 2017 (and associated Circular PL 5/2017), and the 'Information Note: Review of the Wind Energy Development Guidelines 2006-'Preferred Draft Approach'. Issues given particular attention in this regard are:

- a) The provision in Section 10.6.5(f) requiring a setback from residential properties and other centres of human habitation of 10 times tip height. The submissions note how this standard compares with: (i.) the only such standard contained in the 2006 Guidelines wherein it identifies a distance of 500 metres between a property and a turbine as a distance within which a cautionary approach should be taken; and (ii.) the 'Preferred Draft Approach' setback for visual amenity purposes of 4 times tip height subject to a mandatory minimum setback of 500m.
- b) The provision in Section 10.6.5(e) requiring that wind turbines must not be located within the 6 Fresh Water Pearl Mussel catchment areas as listed. A number of submissions contend, given that the wind industry 'does not pose a higher risk than any other development', it should not be subject to additional regulation relative to other industries. Rather, proposals should be assessed on their own merits through environmental assessment and natura impact assessments.

In criticising these provisions, the submissions question the scientific evidence used to justify the departures from national policy, and a number request that the document submitted by Councillor Campbell to the Special Plenary Council meeting of 24th April, 2017 and subsequently re-scheduled to

2nd May, 2017 (as referred to in the Section 28 Statement of the Draft Plan) be made available to the public in the interests of transparency.

All of the submissions also express concerns around the wind farm zoning contained at Map 8.2.1. Again, questions are asked as to the evidence used to arrive at this mapping given how big a departure it is from the mapping contained in the County Development Plan, 2012-2018 (originally adopted Plan).

A range of comments were made in relation to the identified areas 'Acceptable for Augmentation'. Some suggest that these areas should revert to the 'Open To Consideration' zoning. However, if they are to remain, various comments were made expressing concerns as to the practical implementation of the policy. These concerns focus on concerns such as that replacement of end-of-life turbines with more modern models are unlikely to proceed on the basis of the original turbine positions being used like-for-like. Further suggestions were made to the effect that the policy should be more flexible to allow for other forms of renewable energy at the site, as well as facilities for storage of power.

Finally, various submissions refer to the Environmental Assessment and question if the policy framework has been given a robust assessment, particularly those policies that are significant departures from national policy, and particularly in light of the Interim Guidelines and the renewed national policy focus on climate change and mitigation as evidenced by the publication of the National Mitigation Plan.

3.7.6 Chief Executive's response (Part A)

Wind energy was by far the most-frequently addressed issue in the submissions received and has elicited polarised opinions on how the wind energy sector should be addressed in the Plan. On the one hand, there is a strong lobby, made up mainly of members of the public and community based organisations, expressing deep concerns over the impacts of wind turbines, particularly the impacts on humans. This group supports the policy framework contained in the Draft Plan. On the other hand, the wind farm industry has emphasised the importance of the climate change agenda and the need to factor this agenda into the heart of policy formulation, consistent with national policy. The industry makes strong comments about the deviation from national policy and the evidence base used to do so. The submission of the Department also contains strong messages to the Council around the need to give greater weight to the climate change agenda and to adhere to national policy, whereas there are individual submissions making the case for retaining the policies contained in the Draft Plan. In any event, it is clear with the publication of the National Mitigation Plan (July, 2017) and the associated Interim Guidelines and Preferred Draft Approach paper that there is a strategic focus at national level to develop renewable energy to meet our international climate change obligations.

In order to inform consideration of this issue it is useful, and indeed necessary, to recap on the key areas of difference between the Working Draft Plan presented to Members in March, 2017 and the subsequent Draft Plan published on foot of a resolution by Members at the Plenary Council meeting of 2nd May, 2017-both of which for reference are outlined below.

Stage	Summary of key contents
Working Draft Plan (Presented to Members early March, 2017)	Section 6.5: Technical Standards provisions: Wind turbines must meet the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines and in addition must not be located within: <ol style="list-style-type: none"> a) The zone of visual influence (ZVI) of the Glenveagh National Park. b) The zone of influence/ flight path at Donegal Airport. c) Areas identified as locations where wind farm development would not be acceptable as identified on map 8.2.1, chapter 8 of the County Development Plan 2018-2024. d) Special Areas of Conservation (SACs) nor Special Protection Areas (SPAs)

Stage	Summary of key contents
<p>Draft Plan agreed on foot of Members' Resolution at Plenary Council meeting 2nd May, 2017.</p>	<p>Section 6.5 Technical Standards provisions:</p> <p>Wind turbines must meet the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines and in addition must not be located within:</p> <ol style="list-style-type: none"> a) The zone of visual influence (ZVI) of the Glenveagh National Park. b) The zone of influence/flight path at Donegal Airport. c) Areas identified as locations where wind farm development would not be acceptable as identified on map 8.2.1, chapter 8 of the County Development Plan 2018-2024. d) Special Areas of Conservation (SACs) nor Special Protection Areas (SPAs) e) The 6 Fresh Water Pearl Mussel (S.I. 296 of 2009) catchments contained in the Freshwater Pearl Mussel Sub-Basin Management Plans for Clady, Eske, Glaskeelin, Leannan, Owencarrow and Owenea. f) A set back distance of ten times the tip height of proposed turbines from residential properties and other centres of human habitation. <p>6.6 Glenveagh National Park: Zone of Visual Influence <u>Definition:-</u> The environmental and visual character of Glenveagh National Park consists of the geographic extent of the park and its immediate environs. The implementation of the relevant policy should not be interpreted as relating to lands with limited physical or visual connection to the park. The onus is on the applicant to demonstrate the extent of the potential impact a proposed wind energy development has on the National Park.</p> <p>Centre of Human Habitation: <u>Definition:-</u> 'Centre of human habitation' includes schools, hospitals, churches, residential buildings or buildings used for public assembly.'</p>

Section 12(4) of the Planning and Development Acts, 2000-2017 specifies that the response to the issues raised is to take account of any directions of the Members of the Authority under Section 11(4), 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 of the Government or of any Minister of the Government and, if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands. It also requires that the recommendations of the Regional Authority must be summarised and that a recommendation be given which specifies the manner in which those issues and recommendations should be addressed.

The legislation provides that should the local authority decide not to comply with any recommendation made by the Minister or the Regional Authority then it shall inform the Minister or Regional Authority, as the case may be, by notice in writing providing reasons for the decision. It is important to note that the Minister may initiate powers to direct the Planning Authority to take certain measures, in relation to the plan, to make it compliant with an appropriate overall strategy for the proper and sustainable development of the area and which is consistent with Government or Ministerial policies or objectives.

In terms of statutory obligations, Members are referred in particular to Section 10(2)(n), and Section 28 (sub-sections (1), (1A), (1B) and (1C - inserted in December, 2015 under Planning & development [Amendment] Act, 2015) of the Planning and Development Acts.

Section 10(2)(n) provides that:

'...a development plan shall include objectives for the promotion of sustainable development and transportation strategies in urban and rural areas including the promotion of measures to:

- (i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources;*
- (ii) reduce anthropogenic greenhouse gas emissions; and*
- (iii) address the necessity of adaptation to climate change.'*

In its submission on this issue, the Department begins by referring to this provision and the requirements on planning authorities therein. Members are also referred to Circular PL 5/2017 (August, 2017) issued in respect of the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review' (Dept. of Housing, Planning, Community & Local Government, July, 2017) and the statement therein that, in relation to the provisions of Section 10(2)(n):

'Members ... are reminded of their statutory obligations under the planning code in this regard and that in making or varying development plans, they must address renewable energy related policies or objectives when considering the proper planning and sustainable development of the area'.

In response, I would consider that Objective CS-O-13 in the Core Strategy Chapter does seek to : 'promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transport policies.' Similarly, Objective E-O-4 also seeks to : '..facilitate a sustainable and diverse mix of developments which limit the net adverse impacts associated with global warning...' However, it must be acknowledged that these Objectives do not go far enough in complying with the requirements of Section 10(2)(n). This issue is addressed in the recommendations below.

Section 28 of the Planning & Development Act deals with the issuing of guidelines by the Minister and provides that 'planning authorities shall have regard to those guidelines in the performance of their functions', including the making of development plans. Two such Guidelines must be considered:

1. Wind Energy Guidelines 2006 (and associated Circular PI 20-13); and
2. 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review' (and associated Circular PL 5/2017).

The Wind Energy Guidelines 2006 confirms that the development plan must achieve a reasonable balance between responding to overall Government Policy on renewable energy and enabling the wind energy resources of the planning authority's area to be harnessed in a manner that is consistent with proper planning and sustainable development. It says that the assessment of individual wind energy development proposals needs to be conducted within the context of a "plan-led" approach. This involves identifying areas considered suitable or unsuitable for wind energy development and that these areas should be set out in the development plan in order to provide clarity for developers, the planning authority, and the public. The Guidelines also directly address the issue of set back from 'noise sensitive properties' and this is considered in more detail below. Circular PL 20-13 advised that local authorities should defer amending their existing Development Plan policies and should instead operate their existing policies and objectives until the completion of a review of the Guidelines. The more recent Circular PL 5/2017 clarifies that 'The contents of Circular PL 20-13 continues to be the advice of the Department.'

The Interim Guidelines, 2017 focus on administrative procedures which should be carried out by planning authorities in the context of any review or variation to a development plan to be carried out during the interim period prior to the issuing of new Wind Energy Guidelines. The Interim Guidelines note that the development is a critical part of translating national policy on energy, renewable energy and wind energy in a manner that supports the achievement of Ireland's binding international obligations relating to climate change and renewable energy, and taking account of local circumstances. The Interim Guidelines identify that local authorities shall, in particular, have regard to the following national plans, policies and strategies in the plan-making process:

- The National Renewable Energy Action Plan 2010 (Irish Government submission to the European Commission);
- The Government's Strategy for Renewable Energy 2012 – 2020 (DCENR);
- The Government's White Paper on Energy Policy - Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR); and
- The Government's National Mitigation Plan, July 2017 (DCCAE)

In response, I would consider that whilst the second and third items are referred to in Section 8.2.1 of the Draft (and whilst the first item is referenced in the Environmental Report), the references could be given more rounded commentaries. This is addressed in the recommendations below. The recommendation also similarly addresses the National Mitigation Plan bearing in mind that that document was not published until after publication of the Draft Plan.

The Interim Guidelines also contain a 'specific planning policy requirement' issued under Section 28(1C) of the Act that a local authority, in reviewing the Plan, shall carry out a number of specified actions namely:

1. Acknowledge and document national policy on renewable energy;
2. Indicate how implementation of the Plan will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resources (in megawatts).
3. Demonstrate detailed compliance with Item 2 in any proposal to introduce or vary a mandatory setback distance or distances for wind turbines. In this regard, the Minister also notes that such proposals shall be subject to environmental assessment requirements, and that: 'it shall be a material consideration in strategic environmental assessment, when taking into account likely significant effects on climatic factors, if a new or varied mandatory setback proposal would create a significant limitation or constraint on renewable energy projects including wind turbines in the authority's administrative area.'

It is worth noting the clarification contained in the Interim Guidelines that they *'do not replace or amend the existing Wind Energy Guidelines which remain in place pending the completion of the ongoing review...'*

This advice is also repeated in associated Circular PL 5/2017. The Circular also notes the critical role of development plans in translating overall national policy on energy in a manner that supports the achievement of Ireland's international obligations relating to climate change and renewable energy, and taking account of local circumstances. The Circular also refers to Section 10(2)(n) of the Act and the provision therein that development plans are required to include objectives to mitigate against climate change and reduce reliance on fossil fuels. The Circular also sets out the background to the publication of the Interim Guidelines and provides a synopsis of the contents of the Interim Guidelines as set out elsewhere in this report. Finally the Circular refers to the powers available to the Minister under Section 31 of the Act allowing him to direct a planning authority to have to amend a development plan. The Circular advises that where a local authority includes provisions considered to be incompatible with established national policy on renewable energy development and the statutory guidelines, including both the 2006 and Interim Guidelines, consideration will be given to the use of those powers to direct the local authority to remove the incompatible provisions.

Section 28 also requires that a (Section 28) statement is appended to development plans demonstrating how the planning authority has implemented the policies and objectives of the Minister contained in Guidelines or, if applicable, that the authority has formed the opinion that it is not possible, because of the nature and characteristics of the area, to implement certain policies and objectives of the Minister and shall give reasons for the forming of the opinion and why the policies and objectives of the Minister have not been so implemented.

In reaching a conclusion in respect of this Section of the Plan, it will be necessary to fully consider the government policies, strategies and guidelines, and to acknowledge that they cannot be easily disregarded when deciding whether to make or amend this Plan.

During the stage of preparation of the Draft Plan, on the basis of the instruction 'not to change' contained in Circular PL 20-13, the advice consistently provided was not to deviate from the policy framework originally-approved 2012-CDP 2018 (ie. prior to the adoption of Variation No. 2), with the exception of the zoning mapping for which recommendations to change were made on the basis of an evidence-led approach consistent with Guidelines. This advice was provided on the basis that the policy framework in the CDP 2012-2018 was broadly consistent with the requirements of the Wind Energy Guidelines and thus that it was therefore prudent, in the context of the instructions contained in Circular PL 20-13, to retain this framework. The advice was reflected in the Working Draft Plan forwarded to Members in early March, 2017. Notwithstanding, this advice was not accepted and Members resolved to issue a version of the Draft Plan that included significant departures from the 2006 Guidelines thereby contravening the 'do not change' advice contained in the 2013 Circular.

Even in the absence of the Interim Guidelines and associated Circular PL 5/2017, it is likely that the recommendations below would have been consistent with the earlier advice to revert to the wind energy contents of the Working Draft Plan (subject to other amendments discussed below), again on the basis of Circular PL 20-13. The issuing of the new Interim Guidelines and Circular places an even greater onus on the Council to consider very carefully how it proceeds.

The Interim Guidelines '*focus on administrative procedures*' and include a very specific set of actions/steps to be followed by local authorities when reviewing plans with wind energy content. All of these actions are focussed on the development plan's '*critical part in translating overall national policy on energy, renewable energy, and wind energy in a manner that supports the achievement of Ireland's binding international obligations relating to climate change and renewable energy and taking account of local circumstances.*' The last action to be followed, Specific Planning Policy Requirement (3) (SPPR 3) of these Guidelines [issued under Section 28(1C) of the Act], is of particular significance for this plan-making process.

SPPR3 requires that authorities: 'Demonstrate detailed compliance with Item no. 2 [requires indication of how the development plan will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resources (in megawatts)] in any proposal to introduce or vary a mandatory setback distance or distances from specified land uses..

Several submissions, interpret this provision by using the policies in the adopted CDP 2012-2018 (As Varied) as the baseline from which any setback introduction or variation in the Draft Plan should be compared; and, on the basis that the Draft Plan contains the same policy framework, conclude that the Draft Plan does not trigger the detailed compliance requirements of SPPC3.

However, the use of this baseline is considered incorrect. Rather, the test to be applied is simply whether the new Plan includes a mandatory setback distance or distances from specified land uses.

It would be useful at this stage to re-visit advice provided at the time of the making of Variation No. 2, in relation to relevant technical issues pertaining to the two central issues namely the Ten Time Tip height set back, and the Fresh Water Pearl Mussel Catchments.

Set-Back of Ten Times Tip Height

The scale of public support for this provision as regards the protection of residential amenity has been significant and is wholly acknowledged. The national context in terms of Government strategy for climate change and renewable energy has already been set out in detail earlier in this report.

The Wind Energy Guidelines, 2006 and the the Department's 'Information Note: Review of the Wind Energy Development Guidelines 2006-'Preferred Draft Approach' both directly address the issue of set back from 'noise sensitive properties'. The Wind Energy Guidelines, 2006 do not establish an absolute set back but rather identify a distance of 500metres between a property and a turbine as a distance within which a cautionary approach should be taken and therefore do not preclude the identification of

potential impacts at distances greater than 500 metres. The 'Preferred Draft Approach' proposes for visual amenity purposes a setback distance of 4 times tip height between a wind turbine and the nearest point of the curtilage of any residential property, subject to a minimum setback of 500m.

The anticipated Ministerial review of the Wind Energy Guidelines 2006, focussing on proximity, noise and shadow flicker, will ensure a national and strategic response in relation to the issues of health impacts, noise, public safety and visual intrusion, that have been raised in response to this Draft Plan and this will be supported by appropriate evidence to ensure it is reasonable, appropriate and robust, thus facilitating application through the County Development Plan.

Therefore, while acknowledging the strength of public feeling and concern in relation to residential amenity and set back, it is recommended that the Council's policy in relation to residential amenity and set back of turbines, be retained as consistent with the current Ministerial Guidelines and therefore, the recommendation below is not to proceed with the contents of the Draft Plan in this regard but to revert to the policy framework set out in the Working Draft Plan previously submitted for consideration.

Freshwater Pearl Mussel

At the time of consideration of the Variation, it was acknowledged that it is not solely the habitat of the Fresh Water Pearl Mussel (FWPM) that needs to be managed, but also the entire catchment that feeds into that habitat. However, it was also noted that an effective prohibition on wind farm activity is not an appropriate mechanism to use to protect the FWPM as it is only one of a variety of sectors that could influence the survival of the FWPM and all activity that may pose a potential threat cannot reasonably be prohibited within the FPWM catchment without assessment. This aspect of the issue was referred to in many of the submissions made by the industry on the Draft CDP. The previous advice provided that it is advisable to utilise appropriate tools that are available in order to effectively manage development. The use of Appropriate Assessment, under the Habitats Directive, is an effective tool in determining the suitability of developments within the FWPM catchment basins and its findings can inform whether the development can be managed effectively and therefore be compliant with the provisions of the Plan dealing directly with the FWPM including Draft CDP Objective NH-O-6.

3.7.7 Chief Executive's response (Part B)

PART B: SITE SPECIFIC ISSUES

A total of 13 different sites/areas were raised in the submissions and the proposals/requests may be summarised as follows:

- Six sites/areas are the subject of requests to change from 'Not Acceptable' to 'Open to Consideration';
- One site was the subject of a request to extend the area identified as 'Acceptable for Augmentation' and to extend the adjacent area from 'Not Acceptable' to 'Open to Consideration'
- There was broad support for one site;
- Large numbers of submissions against two overlapping areas.
- Re-zoning of a specific site on the basis that, although there is an extant permission on the site (Ref 14/51400), the site is not included identified as being within an area 'Acceptable for Augmentation of/Improvements To Existing Windfarms'.
- Questioning how site is included in area identified as 'Acceptable for Augmentation' when there is no development at the site.

Submissions have been made by representatives of the wind energy production sector that related to specific sites or landholdings in the county. The majority of issues raised concern matters addressed in the thematic response on the wind energy topic and do not introduce new or altered policy considerations.

Particular recommendations are made below that relate to anomalies or omissions brought to light through individual submissions.

Submission Ref No(s).	Location	Proposal/Request	Response	Notes (where applicable)
P21	Adjacent to Shannagh Windfarm, Kilcar	Extension of area zoned as 'Acceptable for Augmentation' to allow for extension to existing wind farm.	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this submission.	
P37, P49, P107 P115	Cronalaght, Gweedore	a) Extension of area zoned as 'Acceptable for Augmentation' to allow for extension to existing wind farm. b) Re-zoning of adjoining area from 'Not acceptable' to 'Open to Consideration'.	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this submission.	
P108	Altnapaste, Ballybofey	Re-zoning of area from 'Not Acceptable' to 'Open to Consideration'.	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this submission.	
P162	Monreagh and Garvey (Scalp Mountain)	Re-zoning of area from 'Not acceptable' to 'Open to Consideration'.	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this submission.	
P170	(Meenbog community group)	Support for windfarm development.	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this submission.	
P179, P186	Clogheravaddy Hill, Altnapaste, Ballybofey	Re-zoning of area from 'Not acceptable' to 'Open to Consideration'.	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this submission.	
P190	Claggan & Loughdoo TD's (Milford)	The basis of the submission is not entirely clear. However, the site is within area zoned as 'Not Acceptable' and it	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this	

Submission Ref No(s).	Location	Proposal/Request	Response	Notes (where applicable)
		is assumed that the request is to re-zone to 'Open to Consideration'.	submission.	
P191	Leamacrossan, Carrowmore or Glentogher TD's near Quigley's Point	The basis of the submission is not entirely clear. Site is largely within area zoned as 'Open to Consideration' and it is assumed that the request is to have the remainder of the site, currently within the area zoned as 'Not Acceptable' re-zoned to 'Open to Consideration'.	Submission noted. Refer to thematic response. No amendment is recommended on the basis of this submission.	
P256	'Carrickaduff' site (site of Strategic Infrastructure Development planning application to An Bord Pleanala ref. PL5/2017)	Re-zoning of area from 'Not Acceptable' to 'Open to Consideration'.	Submission noted. Refer to thematic response and to the material alterations recommended to reflect National Guidelines.	Refers to site re-zoned from 'Open to Consideration' in Working draft Plan to 'Not Acceptable' on foot of Members' resolution at Plenary Council meeting of 2nd May, 2017
P59, P71, P113, P160, P161, P165, P166, P167, P200, P207, P211, P217, P220, P227, P237, P253, P254, P255, P256, P257, P271, P275, P277, P279	'Carrickaduff' site (site of Strategic Infrastructure Development planning application to An Bord Pleanala ref. PL5/2017)	Support for zoning as 'Not Acceptable'.	Submission noted. Refer to thematic response and to the material alterations recommended to reflect National Guidelines.	Refers to site re-zoned from 'Open to Consideration' in Working draft Plan to 'Not Acceptable' on foot of Members' resolution at Plenary Council meeting of 2nd May, 2017
P200, P207, P211, P217, P220, P227, P237, P254, P257, P271, P279	Cashelnavern and Finn Valley TD's	Support for zoning as 'Not Acceptable'.	Submission noted. Refer to thematic response and to the material alterations recommended to reflect National Guidelines.	Not all of the areas within these townlands is zoned as 'Not Acceptable'
P267	Drumenan and Killymasney, Newmills, Letterkenny	Re-zone from 'Acceptable for Augmentation' to 'Acceptable in Principle for 'Wind Farm	Submission noted. Refer to thematic response. No amendment is recommended on	

Submission Ref No(s).	Location	Proposal/Request	Response	Notes (where applicable)
		Development'.	the basis of this submission.	
P180, P181, P182, P183, P184, P185	Derrykillew, Ballyshannon	Request to have site with permission re-zoned from 'Not Acceptable' to 'Acceptable for Augmentation' on basis that it has a live permission (14/51400) and thus was re-zoned incorrectly in Draft PAn	Agreed. This is an error inconsistent with the identification of all other sites with live permissions as 'Acceptable for Augmentation' and should be amended as such in the Material Alterations.	This is a Material Alteration.
P203, P68	Mully/Graffy/Glen of Glenties area, Glenties/Straboy	Question how site is included in area 'Acceptable for Augmentation' as no development at site.	The area is the site of an extant Planning Permission ref No. 09/30520 granted on appeal by An Bord Pleanala for a 10-year period on 14/02/11 and thus 'live' until 13/02/21. Thus the identification of this site is consistent with the approach to this zoning (i.e. to include in this zoning both constructed sites, and sites with extant permission[s] but not commenced).	No change to the existing mapping proposed.

3.7.8 Recommendations of Chief Executive (Part A)

Recommendation 1:

The contrasting concerns expressed by the public submissions have been set out above and illustrate the complexity of the issue. Bearing in mind that the Council is in the process of producing a (new) Development Plan for the period 2018-2024, the contents of this (new) Plan must be considered afresh against national policy requirements. It is evident that the proposed Draft Plan is contrary to Government Circular Letter PL 20-13, (December, 2013), which advised Local authorities to defer amending their wind energy development plan policies pending the completion of the national policy review. The introduction of a specific setback distance is not consistent with the government Wind Energy Guidelines (2006) and the blanket inclusion of the Freshwater Pearl Mussel Basin areas as 'Not Favoured' for wind energy projects may be unreasonable in circumstances where appropriate mitigation measures may be feasible. The Draft Plan is also contrary to the Interim Guidelines and associated Circular PL 5/2017. This Circular reaffirmed that the 2006 Guidelines remain in place. Furthermore, these Interim Guidelines include a specific requirement of local authorities to demonstrate in detail how the development plan will contribute to realising overall national targets on renewable energy, climate change mitigation, wind energy production, and the potential wind energy resources (in megawatts) of any proposal to introduce or vary a mandatory setback distance or distances from specified land uses.

In view of the foregoing it is considered that the Wind Energy section of the Draft Plan does not accord with the proper planning and sustainable development of the area and accordingly Members should not adopt the said Chapter but should instead adopt the Wind Energy Objectives and Policies including the associated mapping contained in the Working Draft Plan submitted to Members in March, 2017.

(This constitutes a Material Alteration)

Recommendation 2:

- a) Move the contents of Section 10.6.5 currently placed in 'Development Guidelines and Technical Standards', Appendix 3, Part B from that Section to Section 8.2, 'Energy' contained in Chapter 8: 'Natural Resource Development'.
- b) Review the Environmental Report and Appropriate Assessment in light of both the change as recommended at 'a.' above and also the insertion of the additional Objective and text as recommended in Recommendations 3 and 4 below.

(This recommendation is made regardless of the finalised contents of [the current] Section 10.6.5.)

(This is a Material Alteration)

Recommendation 3:

Insert a new Objective at Section 8.2.2 to reflect the requirement set out in the Interim Guidelines:

Objective E-O-7:

It is an Objective of the Council to promote sustainable development and transportation strategies in urban and rural areas including the promotion of measures to:

- (i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources;
- (ii) reduce anthropogenic greenhouse gas emissions; and
- (iii) address the necessity of adaptation to climate change.'

(This is a Material Alteration)

Recommendation 4:

Insert new text at Section 8.2.1 to reflect the requirement set out in the Interim Guidelines, as follows:

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 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.

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.

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.

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 opportunities and challenges, mitigation measures currently in place and under development, and specific actions to take forward work within each sector.

(This is not a Material Alteration)

3.7.9 Recommendations of Chief Executive (Part B)

Recommendation 1:

Amend Map 8.2.1 to identify the site of planning permission ref. no. 14/51400 from 'Not Acceptable' to 'Acceptable for Augmentation'.

This is a Material Alteration.

3.8 Themed response on tourism

3.8.1 Synopsis of the section of the Draft Plan

The aim of the tourism chapter of the Draft Plan is to enable Donegal to compete as a world class tourism destination by protecting key tourism assets and supporting the sustainable development of new and existing tourism products and attractions.

3.8.2 Submissions referring to tourism

- A submission was not received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to wind energy. (Ref PB 14)
- Submission received from prescribed bodies: e.g. PB07 (Failte Ireland), PB12 (Department of Culture, Heritage and the Gaeltacht), PB16 (Causeway Coast and Glens Borough Council)
- Submissions received from members of the public: P19, P24, P26, P33, P84, P87, P100, P102, P112, P116, 164, P173, P192, P198, P202, P226, P241, P243, P245, P248, P260, P262, P281
- Submission received from Elected Representatives: LR2 (Fianna Fail Group), LR4 (Cllr Brogan), LR5 and LR7 (Cllr O'Domhnaill),

3.8.3 Summary of the issues raised by Prescribed Bodies

Failte Ireland (FI) made a comprehensive submission, the contents of which are generally very supportive of the Draft Plan, especially the particular focus given in the Draft Plan to Tourism. The submission makes a number of detailed suggestions regarding amendment to text, policy and objectives not just in the Tourism chapter, but other chapters as well including those on Economic Development and Infrastructure. The submission closes with additional comments on wind energy, aquaculture and the 'Town Plans' contained in the Draft Plan. Re wind energy, FI notes that 'a key area of planning that can impact on tourism is wind energy' and that FI is generally supportive when sensitively sited and designed. Finally, FI 'is encouraged by' the inclusion of tourism and the Wild Atlantic Way in a number of economic development policies associated with the towns.

The Department of Culture, Heritage and the Gaeltacht make one suggestion that in the 'Key Challenges' section the bullet referencing the need to protect the natural environment could be expanded to 'include all designated sites, protected species and sites with a significant biodiversity value.'

The Tourism reference in the Causeway Coast and Glens Borough Council is also brief and simply notes the references in the Draft Plan to the Greencastle to Magilligan ferry, and also the Wild Atlantic Way.

3.8.4 Summary of the issues in the remaining submissions

The majority of submissions included various suggestions in respect of practical measures that would enhance the tourism offer in the County. These included: a greater focus on the Fintown Heritage Railway and Brian Friel Centre; a Tourism Support Officer for West Donegal; extension of the season for the Greencastle to Magilligan Ferry and for the ferry operations generally both this one and the Buncrana to Rathmullan service; the additional cruise ship potential of Greencastle Harbour; the need for bye-laws for the use of jet-skis at beach locations; a request for Kilcar to be designated as a Heritage Town; the protection and preservation of the Irish Language in the Gaeltacht area should be considered during the development of any tourism strategies or plans; introduction of bye-laws dealing with indiscriminate overnight parking and wild camping; and a request for practical support for the owners of thatched cottages.

A small number of submissions referenced two important policy areas. The impact of wind farms on the natural resources of the county, and the consequential impacts on the tourism product, were referenced and it was suggested that there should be an exclusion zone of at least 5km between the coast and the nearest turbines. Campervan sites were identified as an important issue. One submission suggested that they should not be allowed in our smaller towns and villages; rather they should be

located a short distance outside. A further submission from a representative group of caravan and camping park site operators seems to have misinterpreted much of the policy framework in the development plan as representing the intentions of the Council to act as a developer in this sector. This submission also expresses strong concerns around 'indiscriminate overnight parking and wild camping' as it is injurious to views and access to views for others and suggests that bye-laws are required to control this and also the practice of cattle roaming beaches.

The issues raised in the four number submissions received from elected members include the following Tourism issues: suggestion that caravan parks and campervan parks should be promoted 'with no restrictions on location within an area that offers tourism opportunity subject to the Technical Standards'; specific suggestions including: the opportunity for a theme park in Donegal; the opportunity to develop/enhance the area around the Port Bridge, Letterkenny towards a walking route along the Swilly, as well as possibly developing the old Thorn Pier; notes good progress made in walking routes and further for further development of walking routes on back of progress in this area to date; request that Portnablagh be included in the Core Strategy as a Layer 3 settlement on account of its established tourism draw and position on the Wild Atlantic Way; and inclusion of an objective to pursue a coastal greenway between Falcarragh and Bunbeg.

3.8.5 Chief Executive's response

The Tourism sector is crucial to the continued growth of the County and has quite correctly been given greater prominence in this Draft Plan than in the current Plan. The generally positive comments of Failte Ireland are welcome as is the absence of any strong opposition to the policy framework as set out. Given this generally favourable response, I do not propose any substantive amendments are made to this Chapter.

The various practical proposals are noted, but are outwith the remit of the County Development Plan and should be considered under different fora. However, I do acknowledge the various policy specific suggestions submitted in response to the Draft Plan and would address each of these in the Table below. I also note in particular the detailed submission from the Donegal Caravan and Camping Parks Association and the suggestions therein for collaborative working between the Group and the Council. I agree that opportunities could be explored in this regard and would note the various tourism working groups in which the Council is strongly represented would present appropriate vehicles in which to do so. The suggestion in relation to unrestricted location of caravan and campervan sites is noted but not agreed. To open the entire County to such development would not be balanced or sustainable, would be detrimental to our towns and villages, and would also create unnecessary pressures on sensitive coastal and other locations. The comments in relation to the opportunity for a 'theme park'-type development and additional walking routes are noted and I am satisfied that the policy framework as drafted (including Policy TOU-P-3 in respect of the Theme Park idea, and Objective TOU-O-9 in the case of new walking and cycling routes) provide sufficient support for such developments in the context of an overall balanced approach to this area.

Finally, whilst the volume of Failte Ireland-suggested amendments to the text, policies and objectives of the Plan is extensive, I am satisfied that the majority of these can be incorporated into the Plan without giving rise to any material changes of direction or emphasis in the document. I propose to revert to Members with a detailed 'point-by-point' recommendation in respect of all of these detailed suggestions.

Submission Ref No(s).	Location (where appropriate)	Issue	Response
PB07		Numerous Tourism aspects of the Plan.	Comments are generally acceptable. However, given the volume of these comments, some additional time is required to collate a comprehensive response for Members and I propose to furnish Members with same in advance of the 6th November, 2107 scheduled Plenary Workshop.
P100	Fintown	Greater focus in Plan on Fintown Heritage Railway and Brian Friel Centre in CDP.	Noted. However, the role of the Development Plan is to provide a strategic policy framework to guide tourism-related development, as opposed to identifying any particular tourism attraction in a relatively random and arbitrary way. The strong reference to the Wild Atlantic Way and the key attractions thereon is acknowledged, however this is in recognition of the key strategic and indeed national importance of this initiative.
P112, P173, P198, P226		Concern around the impact of wind turbines on the natural resources of the County and the consequential impact on the tourism sector. Suggestion of an exclusion zone of at least 5km between turbines and the coast.	Refer to Themed Response on 'Renewable Energy'.
P164, P245		Suggestion that camper vans should not be allowed in towns, and should be required to locate a distance outside of town that is walkable.	The policy framework as contained in Policies TOU-P-11, 17, 18 and 19, together with the other policies in the Plan dealing with issues such as parking, are considered to be balanced and robust in terms of directing such developments to suitable locations
P202		The protection and preservation of the Irish Language in the Gaeltacht area should be considered during the development of any tourism strategies or plans	Whilst the Gaeltacht is not explicitly referenced in the Tourism chapter, the policies and objectives in Chapter 11: Community, Culture and the Gaeltacht are considered to provide a robust policy framework for the consideration of any form of development in the Gaeltacht area, including tourism sector proposals.
P248	Kinnalargy and Rosapenna Townlands	Requests that the general policy presumption against new holiday homes in 'Structurally Weak Areas' is relaxed in these areas.	Not agreed. The rationale for this policy is set out at p.103 of the Rural Housing section of the Core Document and the local circumstances set out in the submission are insufficient to justify any departure from this policy.
P260	Malinbeg	Requests re-zoning of a specific mapped small area of ground from Especially High Scenic Amenity to High Scenic Amenity, 'to	Not agreed in the absence of a clear rationale and in the context of this highly sensitive coastal area.

Submission Ref No(s).	Location (where appropriate)	Issue	Response
		avoid current homesteads and dwellings.	
P116, P192	Moville	Requests zoning of 'lands in front of the former Anchor/Hair of the Dog premises as an Amenity area; and the inclusion of an Objective to secure these lands as publicly accessible open space; and inclusion in the Rights-of-Way listed in the Plan of the associated route from this area to the pier.	Noted. However, a planning application decision of An Bord Pleanála of direct relevance to this issue is currently the subject of judicial review and it would be premature to address these matters at this time, pending the outcome of this case.
LR5	Falcarragh to Bunbeg area.	Inclusion of an objective to pursue a coastal greenway between Falcarragh and Bunbeg.	In the context of the Tourism chapter , particularly Objective TOU-O-9, the success of the Wild Atlantic Way, and the well documented health benefits and economic benefits of such routes, I would agree that the principle of this proposal should be supported in the Plan (see Recommendation below).
LR5	Portnablagh	Portnablagh be included in the Core Strategy as a Layer 3 settlement on account of its established tourism draw and position on the Wild Atlantic Way.	Noted. Refer to Themed Response of Core Strategy
LR4	Letterkenny	Opportunity to develop/enhance the area around the Port Bridge, Letterkenny towards a walking route along the Swilly, as well as possibly developing the old thorn pier.	Noted. These issues will be most appropriately considered in detail during preparation of the Letterkenny Local Area Plan.

3.8.6 Recommendations

Insert new Objective at Section 9.1.2: Objectives, Chapter 9-Tourism so that it reads as follows:

'To support the development of a coastal greenway between Falcarragh and Bunbeg.'
(This is a material alteration)

3.9 Themed response on the marine resource and coastal management

3.9.1 Synopsis of the section of the Draft Plan

This Chapter addresses the coastal fringe of the County and its islands, and the legislative and policy contexts of relevance including the twinned legislative framework of planning permission and foreshore license requirements at present. The Chapter then addresses the economic potential of the zone including the fishing and seafood industries, offshore energy, and marine leisure and infrastructure. The importance of the islands is recognised and the benefits, and options for, the management of the coastal area.

3.9.2 Submissions referring to the marine resource and coastal management

- Submission received from prescribed bodies: PB02 (Heritage Council), PB08 (Northern Ireland Environment Agency), PB11 (Environmental Protection Agency), PB12 (Department of Culture, Heritage and the Gaeltacht)
- Submissions received from members of the public: P33, P70, P72, P81, P83, P102, P117-149 inclusive, P158, P196, P278

3.9.3 Summary of the issues raised by Prescribed Bodies

Heritage Council would welcome an annotated map illustrating the coastal area inclusive of the islands and settlements with information on the population of this area suggesting that it would help to facilitate planned maritime spatial planning for the County and inform strategic planning including with our transboundary partners.

Department of Culture, Heritage and the Gaeltacht request that the section is reviewed in terms of its coverage of the marine and natural heritage.

Northern Ireland Environment Agency note that, while the National Maritime Spatial Plan is not yet in place, some reference to it could still be made at appropriate points in the Plan.

Environmental Protection Agency welcomes the inclusion of specific objectives relating to coastal zone management and coastal protection. Suggest that the Plan should also consider climate change scenarios in terms of extreme weather conditions. The Plan should also include provisions to protect ecological buffers/coastal wetlands/estuaries to ensure that 'the effects of coastal squeeze on protected species and habitats can be managed appropriately. The potential role that estuaries and wetlands can play in flood alleviation could also be highlighted.

3.9.4 Summary of the issues in the Public submissions

A large number of submissions was received in respect of the aquaculture industry. The submissions quantify the importance of the industry advising that it provides in excess of 500 jobs in Donegal and has exports in excess of €30million. It is in this context that they are 'disappointed with the treatment of (our) industry' in the Plan. The key concerns raised are: 1. Whilst there is some reference to the industry and some 'fleeting reference' made to support for onshore/ancillary aquaculture development, and the employment it provides, this is not supported by any objectives or policies in either Chapter 4: Economic Development or Chapter 10. Suggest that this is out of line with national and regional policy. 2. Concerned at the 'massive expansion' of coastline area designated as Especially High Scenic Amenity (EHSA) and that this will 'restrict economic development in rural areas.'

A small number of additional submissions was received raising miscellaneous maritime issues including: concerns around the regulation of shellfish operations in Lough Foyle and the need to prioritise 'status plans' for Lough Swilly and other areas without which it is difficult to 'proof' aquaculture licenses; concerns for the fishing industry arising from Brexit; and support for the Council's dredging policy and infrastructure maintenance.

3.9.5 Chief Executive's response

The concerns of the aquaculture industry are noted and the contribution of this sector to the County's economy is equally noted and appreciated by Donegal County Council. Support for the sector is already explicitly provided in the narrative of the Plan on p.147, although the requirement for careful environmental management is emphasised here also. Notwithstanding, I would agree that more support could be provided in the Plan for this sector whilst at the same time having due regard to the possible environmental impacts and visual impacts of these developments. A new Objective is included in the recommendations below. In terms of the industry's concerns over the expanded Especially High Scenic Amenity areas, these areas were identified in a professional manner having due regard to the attributes of the coastal area at a strategic level. With the insertion of the Objective as recommended below, the policy framework provides a balanced context in which development proposals and foreshore license consultations can be considered.

In terms of the other miscellaneous issues raised, no further recommendations to amend the Plan are proposed. Some of these issues are outwith the scope of the development plan process eg. the Lough Foyle management issues while the remainder are already covered by the established policy framework or, in the case of the coastal flooding issues identified, will be addressed in the Strategic Flood Risk Assessment referred to elsewhere in this report.

3.9.6 Recommendations

Recommendation 1:

Insert an additional bullet at Objective MRCM-O-1 at Section 10.2: Objectives, Chapter 10-The Marine Resource and Coastal Management.

To maximise the social and economic potential of Donegal's marine sector by:

- 'Supporting the offshore primary production sector of the aquaculture industry, subject to adequate environmental assessments and safeguards being provided to the satisfaction of the Council and to the avoidance of the development giving rise to an overbearing visual impact in the locality in which it is proposed.'

(This is a Material Alteration)

3.10 Themed response on community, culture and An Gaeltacht

3.10.1 Synopsis of the section of the Draft Plan

The policy framework set out in Chapter 11, Community, Culture and the Gaeltacht aims to provide an optimum quality of life in a socially inclusive and environmentally sustainable manner through (i) the provision of social community and cultural infrastructure at sustainable locations where they can best serve communities and (ii) by ensuring that future developments protect and strengthen the cultural assets of Donegal, as well as the linguistic and socio-economic vibrancy of Gaeltacht areas.

The chapter emphasises the importance of 'quality of life' which manifests itself across all the subject areas of the Development Plan. The chapter also recognizes the importance of a collaborative approach between public, private and community organizations in the provision of community and cultural infrastructure.

The Plan also emphasises and recognises the need to support the Irish language so as to strengthen Gaeltacht areas and that a collaborative approach is required involving the community, public and private sector. The chapter outlines the advances being achieved through the preparation of County and Community Language Plans.

3.10.2 Submissions referring to Community, Culture and the Gaeltacht

The submissions that relate to Community, Culture and An Gaeltacht are categorised into 2 sections namely those that specifically referenced (i) Community and social issues and (ii) Gaeltacht issues.

Specifically in relation to community/social issues:

- A submission was not received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to community/social issues.
- Other submissions received from prescribed bodies: PB20 (The Department of Education and Skills)
- Submissions received from members of the public: P08, P33, P43, P44, P54, P62, P63, P73, P84, P99, P101, P116, P158, P164, P172, P177, P192, P195, P196, P197, P198, P202, P205, P223, P225, P227, P236, P243, P284 (LATE)
- Submissions received from Elected Representatives:LR7

Specifically in relation to issues related to the Gaeltacht:

- A submission was not received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to issues related to the Gaeltacht.
- There were no other submissions from prescribed bodies in relation to the Gaeltacht.
- Submissions received from members of the public: P24, P158, P202, P209, P235, P243, P258.

3.10.3 Summary of the issues in the submissions

Following on from the sub-categories identified at section 3.10.2, the summary of the issues raised in the submissions is set out in relation to (i) Community and social issues and (ii) Gaeltacht issues.

(i) Summary of the issues raised in relation community and social:

A total of 29 public submissions related to community and social issues together with two prescribed bodies and 1 submission from elected representatives. These submissions related to the importance of safeguarding and protecting community and social infrastructure and in some cases identified particular locations where appropriate opportunities exist. More specifically, the range of issues raised included:

- Zoning of lands for community/recreation purposes (Dunwiley Woods, Drumboe Woods and Moville Pier) and provision of public amenity areas/parks (e.g. Dunwiley Woods)
- The need for the identification of a school site in Bunrana
- Provision/expansion of hospitals (Lifford)
- Identification and provision of greenways, cycleways and walkways

- Installation of public art works
- The need to protect areas of historical/heritage significance
- The need for more liaison with voluntary groups
- Lack of community development with need to have an inventory of community development activities and to monitor activities,

The submission made by the Department of Education and Skills (DoES) refers to Table 2.5 of the Draft CDP which sets out population projections for the towns of Letterkenny, Bunrana, Ballybofey-Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Lifford, Bunbeg-Derrybeg, Killybegs and An Clochán (Dungloe). The submission states that, in these towns the DoES would expect that the existing primary and post-primary schools should be capable of catering for the projected increase in pupil numbers. The submission also makes reference to a permanent site required for Bunrana to accommodate an identified need for education and requests the Council to zone a suitable site. In addition, the DoES submission outlined the methodology for calculating need for schools infrastructure based on population projections and it highlighted technical guidance in relation to the identification of appropriate site for the purposes of education.

(ii) Summary of the issues raised in relation to An Gaeltacht:

In relation to An Gaeltacht, 7 submissions including a submission from Údarás na Gaeltachta (P235) were received that relate to this subject. The range of specific comments in the submissions include;

- The need to support Gaeltacht areas and their communities including through the creation of employment, public transport options and through the provision of housing for Irish language speakers in the Gaeltacht.
- The importance of appropriate signage in the Gaeltacht including the need for prominence in relation to placenames in Irish and accuracy in spelling.
- Require a language impact assessment for every development proposal in the Gaeltacht
- Multi- residential development should be bound by occupancy and linguistic requirements which should be implemented for a period of 15 years
- Regarding genuine local housing need, a level C1 of the European Certificate in Irish should be considered as having a genuine local housing need in a Gaeltacht area independent from any other criteria except the occupancy requirement for 15 years.
- A number of operational matters such as the duty on Government departments and state bodies to implement Irish language policy and the development of services through the medium of Irish.
- Support for the Irish Language Plans for the various Gaeltacht language planning areas in the county
- Specific minor changes to text and typos should be corrected.

Specifically on submission P235 (Údarás na Gaeltachta) is generally supportive of the approach to the strategy set out in the Draft CDP in relation to An Gaeltacht and recommends a number of minor changes to the Plan to provide clarity at certain parts and to correct typos. The suggestions include inserting reference to recently published report entitled 'Update Report to the Comprehensive Linguistic Study on the Usage of Irish in the Gaeltacht; 2006-2011', published in 2015 and that objective CCG-O-8 be amended to include that 'the Council be proactive in providing quality Irish medium service in all their Public Service Offices.

3.10.4 Chief Executive's response:

Central to the future development of the County is the provision of high quality social and community infrastructure and services such as sports and recreation facilities, walking and cycling routes, parks, public spaces, playgrounds, community resource centres', schools, childcare services and healthcare facilities at sustainable locations where they can best serve communities. These are crucial to the creation of sustainable communities and in turn, provide an optimum quality of life for communities and individuals in a socially inclusive and environmentally sustainable manner. It is considered that Chapter 11 provides a robust framework within which sustainable communities and cultural infrastructure can be delivered and this is exemplified through the submissions where the issues raised and suggestions

and amendments are not fundamental in the context of the overall strategy of Chapter 11. The submissions that referenced and delineated site specific zoning amendments for the purposes of recreation and amenity are addressed in the themed response on site specific zoning requests (section 3.12 of this report) which generally outlines that the relevant local area plans are the most appropriate mechanism for the consideration of zoning changes. Meanwhile Chapter 11 provides a suite of objectives and policies that will effectively managing the delivery of new community and social infrastructure (CCG-O-5 and CCG-P-13 refer).

The submission by DoES and their broad support for the Plan is welcomed and the technical guidance and methodology for calculation of future school requirements will be of assistance in the preparation of local area plans for Letterkenny, Buncrana and Bundoran. In the case of school site identification in Buncrana, a collaborative approach has already been undertaken and the LAP will also consider potential options.

The comments of the public submissions in relation to the Gaeltacht are noted. The Plan, through Chapter 11, specifically aims to protect and strengthen the linguistic base and socio- economic vibrancy of Gaeltacht areas and notes the considerable work being undertaken through the preparation of Irish Language Plans. The Plan provides a comprehensive suite of objectives and policies to implement its strategy including CCG-O-8, CCG-P-18 to CCG-P-22 as well as UB-P-20 which provides for Language Impact Assessments for multiple developments of 10 or more units.

The specific suggested amendments made by P235 (Údarás na Gaeltachta) are noted and are considered to be reasonable however, proposed insertion of an additional bullet point into objective CCG-O-8 (to state that the Council will be pro-active in providing quality Irish medium service in all their Public Services Offices) is an operational matter, is therefore not within the remit of the CDP and is appropriately provided for through the Donegal County Council Irish Language Scheme and the Council's Corporate Plan. All of the other suggested clarifications including typos recommended by P235 are provided for through Recommendation 1 in section 3.10.5 below and these are not material alterations.

3.10.5 Recommendations

Recommendation 1:

It is recommended to carry out the following minor edits and non-material amendments as follows:

Item	Amendment
(a)	That text on page 153, third paragraph under the heading of culture be amended so as that the last sentence reads as follows (new text shown in blue, text to be deleted shown in strikethrough): The Council believes that to invest in arts, culture, heritage and language is a commitment to a healthier, more fulfilled, prosperous, enriched and successful county.
(b)	That text on page 154 under the header of 'Recent Decline in Irish Language' be amended so as to insert text into the second sentence of the paragraph so that it reads as follows (new text shown in blue): In particular the key study 'Comprehensive Linguistic Study of the Use of Irish in the Gaeltacht: Principal Findings and Recommendations 2007' and more recently by the 'Update Report to the Comprehensive Linguistic Study on the Usage of Irish in the Gaeltacht; 2006-2011', published in 2015 indicated that this decline is being driven by such factors as: social dynamics (the linking of Gaeltacht Communities to wider English speaking networks), demographic movements (the movement of non-Irish speakers into the Gaeltacht), and socialisation of young people through English.
(c)	That the typo spelling of 'Údarás na Gaeltachta' be corrected at top of page 155.
(d)	That additional text be inserted on page 155, after the bullet point list of Community language Plans to state (new text in blue):

Item	Amendment
	To date two of the plans have been prepared namely 'Gaoth Dobhair, Rann Feirst, Anagaire agus Loch an Iúir' and 'Cloich Chionnaola, Gort an Choirce, An Fál Carrach agus Machaire Rabhartaigh.' The remaining six language plans will be prepared by the end of 2018.
(e)	That the typo spelling in the 2 nd bullet point of Objective CCG-O-8, on page 156 be corrected to state, 'Údarás na Gaeltachta.'
(f)	That the typo spelling in the 5th bullet point of Objective CCG-O-8, on page 156 be corrected to state, 'Páirc Ghnó Ghaoth Dobhair Business Park.'

3.11 Themed response on the Environmental Report and Natura Impact Report

3.11.1 Synopsis of the Environmental Report and the Natura Impact Report

Strategic Environmental Assessment

The preparation of the Draft CDP 2018-2024 was informed by the preparation of a Strategic Environmental Assessment (SEA) in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004 as amended by S.I. No. 201 of 2011) which transpose the European Strategic Environmental Assessment (SEA) Directive 2001/42/EC into Irish Law.

The SEA process is the formal systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt the plan or programme. It informs the plan making process of the likely environmental impacts of alternative actions and contributes to the integration of environmental considerations into plan making.

The Environmental Report, Part D of the Draft CDP, sets out how the SEA was carried out for the Draft Plan, and includes a description of the current environment (baseline) of the County along with an assessment of the effects of implementing the policies and objectives of the Draft CDP, necessary changes and considerations and mitigation and monitoring proposals going forward.

Appropriate Assessment

An Appropriate Assessment of the Draft CDP was carried out pursuant to Article 6 of the EU Habitats Directive (92/43/EEC), the EU (Birds and Natural Habitats) Regulations 2011 (S.I No 477 of 2011 as amended by S.I. No 355 of 2015) and the Planning and Development Act 2000 (as amended) (including by the Environmental (Miscellaneous Provisions) Act 2011).

The requirements for Appropriate Assessment of plans or projects, including masterplans, is outlined in Article 6(3) and (4) of the EU Habitats Directive (92/43/EEC). In any case where, following screening for Appropriate Assessment, it is found that any plan or project is likely to have a significant impact on areas designated as Natura 2000 sites, a full Appropriate Assessment must be carried out.

The Draft CDP was screened for Appropriate Assessment (including consultation with the Environmental Authorities) and it was concluded that an Appropriate Assessment (Stage 2) of the proposed Draft CDP was required as it could not be excluded, on the basis of objective information, that the proposed CDP, individually or in combination with other plans or projects, would not have a significant effect on a European site. The mitigation measures identified in the Stage 2 Appropriate Assessment (i.e. Natura Impact Report) have been incorporated into the Draft CDP. The Natura Impact Report was published parallel to the Draft County Development Plan 2018-2024 and the Environmental Report.

3.11.2 Submissions referring to the Environmental Report and the Natura Impact Report

- A submission was received from the Department of Planning, Housing and Local Government (DoPHLG) in relation to the SEA process (PB14).
- Other submissions received from Prescribed Bodies: PB03 (Derry City & Strabane District Council); PB05 (Geoheritage Programme, Department of Communications, Climate Action & Environment, Geological Survey of Ireland); PB08 (Northern Ireland Environment Agency); PB11 (EPA); PB12 (Department of Culture, Heritage and Gaeltacht) and PB16 (Causeway Coast and Glens Borough Council).
- Submissions received from members of the Public: P102; P153; P204; P221 and P256.
- Submission received from Elected Representatives: LR2 (Fianna Fáil Grouping) and LR3 (Cllr John Campbell).

3.11.3 Summary of the issues raised in the submission made by the DoPHLG in relation to Environmental Report and the Natura Impact Report

The submission from the Department of Planning, Housing and Local Government (DoPHLG) states that the Draft Plan policies and technical standards on wind energy be reviewed to comply with the requirements of the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (DoPHLG, July 2017), and the SEA shall include an environmental assessment of the technical requirements relating to wind energy developments as contained in the Draft CDP.

3.11.4 Summary of the issues in the remaining submissions

The submission by Derry City & Strabane District Council states that *"it is satisfied with the content of the Environmental Report and how it has shaped the preparation of the draft Plan. The mitigation discussed appears commensurate with the likely impacts foreseen and we note that certain applications for developments within the County may be subject to individual Environmental Impact Assessments (EIA) and Appropriate Assessments (AA)."*

The submission by the Geoheritage Programme, Department of Communications, Climate Action & Environment, Geological Survey of Ireland (GSI) requests that the second paragraph in Section 5.11 of the Environmental Report 'Soil and Geology' be replaced in its entirety with the following text:

"County Donegal has a long and interesting geological history. Inishtrahull, off the north coast, is the oldest part of Ireland as the rocks there have been dated at almost 1.8 billion years old. Most of the County is metamorphic schist and gneiss of the Dalradian Group formed in a major mountain building event over 450 million years ago at the closure of the Iapetus Ocean. Granite bodies intruded into the metamorphic rocks mainly in the west of the county approximately 405 million years ago. Finally limestone rich in marine fossils formed in south Donegal in the Carboniferous period, approximately 360 million years ago when Ireland was in the tropics. Donegal is cut by a series of south west-northeast trending faults including the Gweebarra fault in the north of the county. The landscape of County Donegal formed in the last glaciation over 12,000 years ago and many features of glacial erosion, transport and deposition are seen around the county including Barnesmore Gap."

The GSI submission further requests that the title of Table 5.13 in the Environmental Report 'List of Geological Heritage Programme Sites' be changed to 'List of County Geological Sites'. With regards to Table 8.2 in the Environmental Report the submission requests that the word 'increase' should be removed from the target column Environmental Objective SL2: 'Protect and conserve geological sites' and reference should be made to enhancing/promoting current sites.

The submission by the Northern Ireland Environment Agency (NIEA) provides a detailed response in relation to specific items in the Environmental Report for the Draft CDP including suggested wording to be inserted in the Environmental Report and amendments to Environmental Objectives BIO1 and BIO4 and can be summarised as follows:

- The submission states that on p54-56 of the Environment Report, reference should be made to Fermanagh Development Plan and emerging Fermanagh and Omagh District Council Development Plan.
- On p82 DAERA would welcome consultation where Significant Effects are likely in relation to Article 10 'Stepping stones'.
- With regards to Table 8.2 p168 in relation to compliance with Habitats Directive and the 15km buffer, the submission suggests that cross border Natura 2000 sites should be considered and not confined to Co. Donegal.
- In relation to Environmental Objective BIO4 the submission suggests that protection of 'Macro corridors' and areas of contiguous habitat should take into account cross border linkages.
- On p173 Table 8.3, cross border linkage Natura 2000 sites should be safeguarded from damaging development.
- Objective BIO1 should refer to trans-boundary obligations.

The submission by the EPA notes its recently published State of the Environment (SoE) report - *Ireland's Environment-An Assessment 2016* and refers specifically to Chapter 16 of the report which identifies key challenges for Ireland noting that each of these findings are relevant in the context of the

Plan; including the sections on Natural and Built Heritage. The EPA suggests that the CDP should include relevant objectives and policies to address key environmental challenges. In addition the EPA make a number of observations in relation to the Environmental Report and/or the AA/SEA processes which can be summarised as follows:

- It appears that many of the proposed changes outlined in Table 10.1 of the Environmental Report, *Incorporating Environmental Issues into the Plan*, have not been incorporated into the CDP. DCC should ensure that all mitigation measures outlined in SEA are fully integrated into CDP.
- In relation to Part A: Appendix I - 1.3 *Strategic Environmental Assessment and Appropriate Assessment* - There would be merit in including a summary of key findings and recommendations of the SEA and AA, including mitigation measures, and how these have been integrated into the CDP. The inclusion of *Fig. 1.2 Vulnerability Mapping in County Donegal*, which provides a useful overview of sensitivities, could also be considered.
- The Non-Technical Summary (NTS) of the Environmental Report should fully take into account the requirements of Schedule 2B(h) of the SEA Regulations (S.I. No 436 of 2004). There would be merit in including Figure 1.2 of the Environmental Report *Vulnerability Mapping in County Donegal* in the NTS. The NTS should also include specific information on the proposed monitoring programme. Consideration should be given to including radon levels in the vulnerability mapping to identify areas where significant radon accumulations within the Plan area may occur.
- In both Table 4.1 of the Environmental Report *Assessment of Alternative Approaches to the Plan in the Context of the Strategic Environmental Objectives (SEO's)* and Table 8.4 of the Environmental Report *Assessment of Strategic Policy Objectives*, the strategic environmental objective 'AC3' appears to have been omitted. An additional objective 'CM3' is included in these tables which are not referred to elsewhere in the Report.
- Clarification should be provided on how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations have been assessed and documented. In particular, the CDP should assess the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects, including those of a Transboundary nature. How the full range of potential effects will be monitored and mitigated for over the lifetime of the CDP should also be clarified.
- It should be ensured that a requirement is included to carry out Appropriate Assessment in relation to plans / programmes / projects where development proposals may impact on Natura 2000 sites.
- The reference to the County Donegal Heritage Plan 2014-2019 in the Plan is acknowledged. The inclusion of a specific policy/objective in the CDP to protect existing ecological corridors and habitats and species, undesignated sites / areas of local biodiversity interest and to improve green infrastructure where possible should also be considered. Consideration could be given to prioritising wetland habitats, including carrying out a survey of wetland sites within the County.
- The SEA Environmental Report could clarify whether available habitat mapping (including wetlands) has informed the preparation of the report.
- The EPA welcomes the inclusion of Table 8.1 of the Environmental Report *Environmental Monitoring of the County Donegal Development Plan 2012-2018*. The submission state that the issues highlighted by these monitoring results should be taken into account in finalising the CDP and SEA. Further detail should be provided on the monitoring proposed, including:
 - 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.
- 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.
- Following adoption of the Plan, an SEA Statement "*Information on the Decision*" should be prepared and sent to any Environmental Authority consulted during the SEA process.

The submission by the Department of Culture, Heritage and Gaeltacht Development Applications Unit (DoCHG) makes a number of observations in relation to the SEA process and the Environmental Report and the AA process and the Natura Impact Report which can be summarised as follows:

- The submission states that a copy of the Appropriate Assessment Natura Impact Report of the Draft County Donegal Development Plan 2018–2024 was not forwarded to the Department for its review and consideration. If required, an Appropriate Assessment must be carried out by the Council before the Plan is made, and no Plan that would have (or perpetuate) adverse effects on the integrity of a site may be made (unless in exceptional circumstances where the provisions of Article 6(4) of the Habitats Directive may be invoked).
- In addition to being the competent authority for the Appropriate Assessment of the Plan, the Council should be mindful of its duties as a Public Authority, under Regulation 27 of the European Communities (Birds and Natural Habitats) Regulations, 2011, to 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 these Regulations.
- The DoCHG notes that the term 'Natura 2000 sites' is used and/or defined in ways that are inconsistent with the Part XAB of the Planning and Development Act, 2000 as amended (and also with the 2011 Regulations). The Department recommends that terminology be used in a manner that is consistent with the relevant legislation, and corrected or amended where necessary throughout the final plan and environmental assessment documentation.
- No direct reference to the appropriate assessment process was noted within the main body of the plan. This should be reviewed and improved so that there is clarity and transparency regarding the mitigation that is deemed necessary, and so that the Plan, its policies and objectives can be found to pass the tests of Article 6 of the Habitats Directive. The first reference was noted in Part A Appendix 1. In Section 1.3 of this Appendix it would be useful to include a full reference to the relevant legislation under which this assessment process is carried out and consistency of use should be applied.
- In general, the scale of mapping of designated sites within the Environmental Report could be improved for ease of use. The documentation as a whole would benefit from a glossary of terms.
- The submission provides a detailed response in relation to specific items in the Environmental Report including suggested wording to be inserted in the Environmental Report and amendments to Environmental Objectives BIO1, BIO2, BIO3 and BIO4, in the interests of clarity.
- The written statement of the NIR contains objectives for development within European sites or which are unlikely to be able to avoid such sites, or where the location is not currently known. Plan-level mitigation must be demonstrated to be effective in addressing and ameliorating the full range of any adverse effects on the conservation objectives and integrity of European sites.
- Account will have to be taken of any significant effects on European sites arising from proposed amendments or material alterations in due course.

The submission by the Causeway Coast and Glens Borough Council states that it generally agrees with the content of the Environmental Report and Natura Impact Report.

- In relation to the Environmental Report the submission notes the content of the Report, in particular tables in relation to protected ecological sites in Northern Ireland, scoping of SEA topics, summary of main environmental pressures, environmental protection objectives and incorporating environmental issues into the Plan. The submission includes a number of maps showing the environmental designations within the CC&G Borough.
- In relation to the Natura Impact Report (NIR), the submission notes the content of the Report in particular Table 3 which highlights those policies and objectives which have been amended in the Draft CDP and the lists of SACs listed in Appendix 1 which lie within the CC&G Borough. The submission refers to two additional documents of relevance, namely the UK Marine Policy Statement and the Northern Ireland Marine Plan (once published) which should be considered in the final NIR. The submission welcomes the NIR conclusion of no significant effects and no requirement to proceed to stage 3 of the AA process.

The submissions from the public have a number of reoccurring themes in relation to the Environmental Report and the Natura Impact Report and the SEA/AA processes in particular in relation to Wind Energy and the resulting noise impact and associated impacts on human health. The concerns raised in the public submissions in relation to the Environmental Report can be summarised as follows:

- The Environmental Report does not demonstrate how the ten times tip height separation distance for wind turbines could impact on achieving National energy policy targets. It is noted that this may contravene the 'Interim Wind Guidelines' which states that such proposals shall be a material consideration in the Environmental Report.
- The report does not provide the necessary information in relation to Objective E-O-6 which states: "*To ensure that wind energy developments do not adversely impact upon the existing residential amenities of residential properties, and other centres of human habitation (as defined at Para. 6.6, 'Wind Energy', Appendix 3, Development Guidelines and Technical Standards, Part B, Objectives and Policies of the Plan)*".
- It fails to identify the impacts of windfarms on human health as an issue. In addition, it is contended that the noise impacts of windfarms has not been included and that the interrelationships of the impacts of windfarms on a wide range of issues such as material assets, water, soil, flora etc. have not been properly examined or identified. Mitigation measures are therefore deemed to be inadequate.
- The Environmental Report fails to take account of the massive restrictions being placed on the development of onshore wind and will have to be altered to take account of and justify the position put forward in the Draft CDP.
- The Draft CDP and SEA must demonstrate how and where the national renewable energy and climate change targets can be delivered at local level in Co. Donegal.
- The SEA must critically assess the stated policies and objectives of the Draft CDP. The SEA currently fails to assess whether the policies of the Draft Plan are sufficient to meet Donegal's obligations to help achieve national climate change targets.
- The significant constraints being applied to the existing wind energy strategy are neither acknowledged, discussed nor argued against within the SEA of the Draft CDP. The air and climate indicators and targets proposed to be utilised to monitor the significant environmental effects of the implementation of the Draft CDP are too narrow in their scope and are unfit for purpose (it is suggested that the repetition of environmental objectives, indicators and targets from the Environmental Report of the CDP 2012-2018 does not provide for a sufficiently measurable account of the likely environmental effects of implementing the Draft CDP. This is particularly pertinent given the significant changes in relation to wind energy. It is submitted that the Environmental Report on the Draft CDP does not meet the requirements of the SEA Directive.

The concerns raised in the public submissions in relation to the Natura Impact Report can be summarised as follows:

- The Natura Impact report fails to acknowledge the fact that human activity can have impacts on the environment such as construction, concrete, road widening as interventions can block the natural flow of drainage waters.
- The mitigation measures contained in the Natura Impact Report are inadequate and that a moratorium on wind farm development is necessary.
- The reference to a coastline of 1.2km on pg. 18 is incorrect. The submission appears to state that in lieu, the coastline is c. 1,134km.

The submissions by the Elected Representatives generally relate to local issues affecting their constituencies. With specific reference to the Environmental Report and the Natura Impact Report and the SEA/AA processes the submissions from the Elected Representatives can be summarised as follows:

- The Inishowen Elected Member request that areas of EHSA should remain with same wording as previous Plan with no policy restriction or recommendation.
- The Fianna Fáil Grouping submission requests that pearl mussels only be in the plan 'IF' they are needed and if so policies should be restricted to the river basin areas only.
- The submission by Cllr John Campbell relates to two specific issues with regards to Wind Energy, namely Part A: Appendix 2-Section 28 Statement and Circular letter PL 5/2017 & 'Interim Guidelines'. In this regard it is noted that the submission makes reference to the Environmental Report and the SEA process in terms of Wind Energy.

3.11.5 Chief Executive's response

In response to the submission from the DoPHLG, it is important to note at the outset that the 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' were published subsequent to the making of the Draft Plan. Notwithstanding this, given the nature of the concerns raised by the DoPHLG with specific reference to wind energy, a detailed response to the concerns raised is provided under the Themed Response for Renewable Energy and Natural Resources in Section 3.7 of the Report.

The underlying theme running through many of the submissions by the Prescribed Bodies is the requirement for a full and transparent integration of environmental considerations in the CDP and the integration of the Plan-making and SEA and/or AA processes. In general, the observations in the submissions in relation to the Environmental Report are considered useful and appropriate albeit somewhat minor in nature and therefore not considered to impact materially on the Environmental Report or on the SEA process, such as inconsistencies in the draft documentation, inconsistencies in language and terminology across the documentation, or inadvertent typographical errors. Where the suggested amendments were considered appropriate they have either been included as non-material changes to the Environmental Report or as recommended in Section 3.11.6 of this Report.

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, Part D of the Draft CDP. In this regard, we note the support from Derry City & Strabane District Council confirming their satisfaction with the content of the Environmental Report and how it has shaped the preparation of the Draft Plan; this is most welcome and testimony to the on-going communication and discussion with or cross-border counterparts.

We note the comments of the EPA that the Non-Technical Summary (NTS) of the Environmental Report should fully take into account the requirements of Schedule 2B(h) of the SEA Regulations (S.I. No 436 of 2004) in relation to the consideration of alternatives. Table 1.4 of the Environmental Report (and duplicated below) sets out the information to be contained within the Environmental Report as set out in Annex 1 of the SEA Directive (2001/42/EC) and indicates where in this Report each is included. In this regard, it is noted that Section 4 of the Environmental Report entitled 'Alternative Approaches to the Plan' considers the requirements of Schedule 2B(h) of the SEA Regulations and sets out and examines three alternative growth models for the County. Contrary to the EPA's submission a summary of this section of the Report is also included in the NTS on pg. 3 of the Environmental Report.

Extract from the Environmental report - Table 1.4: Checklist of Contents of Environmental Report

Contents of Environmental Report		Section of Report
(a)	An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	1
(b)	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Plan or programme	5 8
(c)	The environmental characteristics of areas likely to be significantly affected	5
(d)	Any existing environmental problems which are relevant to the Plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC (as amended by Directive 2009/147/EC) and Directive 92/43/EEC	5
(e)	The environmental protection objectives, established at international, Community or Member State level, which are relevant to the Plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	8
(f)	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic	6

	factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	
(g)	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the Plan or programme	9
(h)	An outline of the reasons for selecting alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information	4
(i)	A description of the measures envisaged concerning monitoring in accordance with Article 10	8
(j)	A Non-Technical Summary of the information provided under the above headings	1

A number of the submissions by the Prescribed Bodies also reference various documents which should be considered in the policy context in the Draft CDP and/or in the Environmental Report and Natura Impact Report. It is noted that some of the said documentation namely the '*Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change*' and the '*Department of Communications, Climate Action & Environment, National Mitigation Plan (July 2017)*' were published subsequent to the making of the Plan. Notwithstanding this, it is confirmed that a full and thorough review of the draft documentation will be carried out having regard to the latest policy documents and any necessary changes on foot of this review will be implemented in the Final CDP and associated documentation, and where required will be subject to the SEA/AA processes.

Cumulative impacts and interactions have been considered throughout the Environmental Report in accordance with Annex 1 of the SEA Directive 2001/42/EC. The Environmental Report details the 'Current State of the Environment' or 'Baseline' of County Donegal using known available data sources. 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 impacts and interactions vary in extent and nature and the level of inter-relationships are illustrated on Table 5.2 of the Environmental Report. In addition relevant plans that could contribute to in combination effects in conjunction with the Draft CDP are outlined in Section 6.3 of the NIR with summary comment on the nature of possible interactions. All documents outlined in the NIR are generally strategic in nature with far-reaching influence and overlapping objectives. Many of these plans make positive environmental statements and set a policy framework that will ensure the co-ordinated development of the state. In light of the scale and nature of the plans and projects listed above, the possible extent and character of in-combination effects is somewhat uncertain and may be difficult to assess at this County scale. However, it is clear from a review of the policies and objectives of the Draft CDP that there are sufficient safeguards (additional policies and mitigation) in place to ensure that there will not be any significant in combination effects on the Natura 2000 network.

Having regard to the submissions made in relation to Flood Risk, it is noted in Section 3.4 of this Report that work has commenced in-house on the preparation of a Stage 1 Strategic Flood Risk Assessment (SFRA) which will lead to clarification of appropriate locations of which a stage 2 (Initial Flood Risk Assessment) is required. It is noted that the Stage 1 SFRA may include recommendations for particular amendments to the CDP and the Environmental Report that would be material alterations.

In the interest of clarity, we confirm that the Draft CDP was screened for Appropriate Assessment (including consultation with the Environmental Authorities) and it was concluded that an Appropriate Assessment (Stage 2) of the proposed Draft CDP was required as it could not be excluded, on the basis of objective information, that the proposed CDP, individually or in combination with other plans or projects, would not have a significant effect on a European site. The Natura Impact Report was published parallel to the Draft County Development Plan 2018-2024 and the Environmental Report. It

is noted that the Draft CDP includes policies to protect the Natura 2000 network through compliance with Article 6 of the Habitats Directive as part of the assessment of development proposals.

In accordance with Section 12 of the Planning and Development Acts it is confirmed that a copy of the Draft CDP and Environmental Report was issued by post to the Prescribed Bodies for their review and consideration in May 2017. The correspondence also included an email as to where an on-line copy (electronic copy) of the Appropriate Assessment Natura Impact Report was available for viewing. Furthermore, it is noted that DCC is fully aware of its duties as a Public Authority, under Regulation 27 of the European Communities (Birds and Natural Habitats) Regulations, 2011, to 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 these Regulations.

There are a number of reoccurring themes, in the submissions from the Public, in relation to the Environmental Report and the Natura Impact Report and the SEA/AA processes in particular in relation to Wind Energy and the potential noise impact and associated impacts on human health and Climatic impacts; a detailed response to the concerns raised is provided under the Themed Response for Renewable Energy and Natural Resources in Section 3.7 of the Report. As noted above, in light of recent publication in relation to Wind and Climate the CDP and Environmental Report will be reviewed having regard to the national renewable energy and climate change targets and how they can be delivered at local level in Co. Donegal.

The submissions by the Elected Representatives generally relate to Wind Energy and suggest that the technical standards applicable to Wind Energy have not been adequately addressed in the Environmental Report or subject to SEA testing. In the interest of avoiding undue repetition a detailed response to the concerns raised is provided under the Themed Response for Renewable Energy and Natural Resources in Section 3.7 of the Report. Notwithstanding this, while it is acknowledged that the technical standards were not subject to SEA testing it is confirmed that all Energy objectives and policies contained in Section 8.2 of the CDP were assessed as part of the SEA and AA processes. Furthermore, it is noted that it is a recommendation under Section 3.7 of this Report to incorporate the technical standards for Wind Energy into the objectives and policies in Section 8.2 of the Plan which will result in material alterations and as such a SEA and AA will be required to be carried out on the suggested amendments.

In addition the submissions the Elected Representatives raise concerns in relation to Freshwater Pearl Mussels (FPM) and the perceived blanket ban on development in FPM designated areas. In this regard it is noted that FPM is a protected species under the European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009 which sets environmental quality objectives for FPM habitats, and requires the production of sub-basin plans with programmes of measures to achieve these objectives. It sets out responsibilities of public authorities in terms of sub-basin plan implementation. A detailed response in relation to submissions on FPM is provided under the Themed Response for the Natural and Built Heritage including impacts on the Environment in Section 3.6 of the Report.

3.11.6 Recommendations

Recommendation 1:

It is recommended to carry out the following minor edits and non-material amendments to the Environmental Report and Natura Impact Report.

Item	Amendment
(a)	It is recommended to amend the second paragraph in Section 5.11 of the Environmental Report 'Soil and Geology' so that it reads as follows: (NB: New text shown in blue and text to be deleted shown in strikethrough) County Donegal is one of the most complex geological areas in Ireland. Its key geological features are the Gweebarra fault that continues under the Atlantic and also forms another diagonal rift through the Scottish Highlands and which was formed

	<p>through granite rock by glacial erosion. Igneous rock is the predominant rock type in Donegal with glass-like quartz, feldspars and black mica evidenced in the Granite. The County also includes large areas of metamorphic rocks including schists and gneisses and Quartzite as evidenced on Errigal.</p> <p>"County Donegal has a long and interesting geological history. Inishtrahull, off the north coast, is the oldest part of Ireland as the rocks there have been dated at almost 1.8 billion years old. Most of the County is metamorphic schist and gneiss of the Dalradian Group formed in a major mountain building event over 450 million years ago at the closure of the Iapetus Ocean. Granite bodies intruded into the metamorphic rocks mainly in the west of the county approximately 405 million years ago. Finally limestone rich in marine fossils formed in south Donegal in the Carboniferous period, approximately 360 million years ago when Ireland was in the tropics. Donegal is cut by a series of south west-northeast trending faults including the Gweebarra fault in the north of the county. The landscape of County Donegal formed in the last glaciation over 12,000 years ago and many features of glacial erosion, transport and deposition are seen around the county including Barnesmore Gap."</p>
(b)	It is recommended to reference the Fermanagh Development Plan and emerging Fermanagh and Omagh District Council Development Plan in Table 1.5 of the Environmental Report.
(c)	It is recommended to cross reference Table 4.1 of the Environmental Report ' <i>Assessment of Alternative Approaches to the Plan in the Context of the Strategic Environmental Objectives</i> ' (SEO's) and Table 8.4 of the Environmental Report ' <i>Assessment of Strategic Policy Objectives</i> ', to rectify any inconsistencies in the tables.
(d)	In the interest of clarity it is recommended to review the structure of the Environmental Report and amalgamate sections 5.8 Population and Human Health and 5.9 Population Trends to provide a new Section 5.8 Population
(e)	It is recommended to review the structure of the Environmental Report and provide a new Section 5.9 Human Health having regard to the EPA report entitled 'Air Quality in Ireland 2015' provides information in relation to the link between air pollution and human health and the Haase Pratschke 2011 profile for County Donegal.
(f)	It is recommended to amend the title of Table 5.13 in the Environmental Report ' List of Geological Heritage Programme Sites ' be changed to ' List of County Geological Sites ' (NB: New text shown in blue and text to be deleted shown in strikethrough)
(g)	It is recommended to review and update Section 5.12 Water and Section 6.4 Water of the Environmental Report having regard to the EPA's latest 'Water Quality in Ireland 2010-2015' Report (August 2017) which was published subsequent to making the draft Plan. This report provides an update on the status and trends of Irish waters (groundwater, rivers, lakes, canals, transitional waters and coastal waters) following the completion of the first six-year cycle of the Water Framework Directive (2010–2015).
(h)	It is recommended to review and update Section 5.13 Wastewater of the Environmental Report having regard to the Irish Waters latest Capital Investment Plan to cover the period 2017-2021 (known as IP2). As part of this, a review of all water and wastewater infrastructure in County Donegal was undertaken by Irish Water. The results of this review will feed into the final IP2 2017-2021. The document 'Interim Revenue Control 2017-2018 for Investment Plan 2017-2021' was published in August 2016 which identifies 39 water/wastewater capital projects for Donegal with a total budget of c. €150 million (€81m on wastewater and €68m on water).
(i)	It is recommended to review and update Section 5.14 Wastewater Treatment of the Environmental Report having regard to the EPA's most recent report 'Urban Waste Water Treatment in 2015' which was published in 2016. The EPA 2015 report records Donegal is one of three counties that collectively account for 45% of the area that are non-compliant with the effluent quality standards.
(j)	It is recommended to review and update Section 5.17 Bathing Water Quality of the Environmental Report having regard to the latest findings of the 'Report on Bathing

	Water Quality 2016' published in 2017, the results of EPA Water Quality Assessments for the Plan Area for the period 2014-2016 and the latest information in relation to Blue flag Beaches and Green Coasts for County.
(k)	<p>It is recommended to amend the title of Section 5.18 Climate Change to Section 5.17: Climate Change and Air Quality and review both Section 5.17 and Section 6.5 Climate Change and Air Quality in the Environmental Report having regard to the following:</p> <ul style="list-style-type: none"> • The Department of Communications, Climate Change and Environment (DCCA) 'National Mitigation Plan' published in July 2017 subsequent to the making of the Draft CDP; • The Department of Housing Planning and Local Government, 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' published in July 2017 subsequent to the making of the Draft CDP; • The DCENR's White Paper which sets out a framework to guide energy policy between now and 2030, with the aim to improve Ireland's renewable energy target and reduce carbon emissions in accordance with the EU objective of a low carbon society by 2050 ; • Ireland's commitment under The Paris Agreement of December 2015 to reduce greenhouse gas emissions by at least 40% by 2030 compared to 1990 levels; • The EPA's 'National Ambient Air Quality Monitoring Programme 2017-2022, October 2022' expected to be finalised and published in 2017.
(l)	It is recommended to amend the title of Section 5.20 Climate Change and Coastal Management to Section 5.19 Marine and Coastal Management and review both Section 5.19 and Section 6.6 Marine and Coastal Resource having regard to HARNESSING OUR OCEAN WEALTH, An Integrated Plan for Ireland, 2012 the EU Marine Strategy Framework Directive and other pertinent policies and guidelines.
(m)	It is recommended to review and update Section 5.21 Cultural, Archaeological and Architectural Heritage and Section 6.8 Cultural, Archaeological and Architectural Heritage of the Environmental Report to take cognisance of the recently completed work on updating the RPS.
(n)	It is recommended to include a new Section 5.23 Inter-relationships Between Environmental Topics including a matrix of key inter-relationships identified in this SEA, in the interests of clarity.
(o)	It is recommended to review Section 8.1 of the Environmental Report to clarify how monitoring of the potential environmental effects will be monitored and mitigated for over the lifetime of the CDP.
(p)	It is recommended to amend Table 8.2 in the Environmental Report by; the word 'increase' should be removed from the target column Environmental Objective SL2: 'Protect and conserve geological sites' and reference should be made to enhancing/promoting current sites.
(q)	<p>It is recommended to amend Strategic Environmental Objective BIO1 in Table 8.3, Chapter 8 of the Environmental Report, Part D of the Draft CDP so that it reads as follows: (NB: New text shown in blue and text to be deleted shown in strikethrough)</p> <p>BIO1 Ensure compliance with the Habitats Directive by protecting all Natura 2000 sites and habitats of species (SACs and SPAs) within the County and within a surrounding 15km buffer, or a wider zone of influence where potential impact is considered possible, including Freshwater Pearl Mussel catchment areas.</p>
(r)	In the interests of clarity it is recommended to review the wording of the Strategic Environmental Objectives BIO2, BIO3 and BIO4 in Table 8.3 of the Environmental Report, to take into account cross border linkages and to ensure the protection of 'Macro corridors' and areas of contiguous habitat should.
(s)	It is recommended to review and cross reference Table 10.1 of the Environmental Report 'Incorporating Environmental Issues into the Plan' to ensure all suggested changes to objectives and policies and mitigation measures are included in the CDP

	and associated documentation and mapping as required.
(t)	It is recommended to review the scale of mapping of designated sites within the Environmental Report.
(u)	It is recommended to include a glossary of terms in the Environmental Report.
(v)	It is recommended to include a summary of key findings and recommendations of the SEA and AA, including mitigation measures, and how these have been integrated into the CDP in Part A: Appendix I - 1.3 <i>Strategic Environmental Assessment and Appropriate Assessment</i> of the CDP.
(w)	It is recommended to include a copy of Figure 1.2 from the Environmental Report ' <i>Vulnerability Mapping in County Donegal</i> ', which provides a useful overview of sensitivities in the County in Part A: Appendix I - 1.3 <i>Strategic Environmental Assessment and Appropriate Assessment</i> of the CDP.
(x)	It is recommended to include a full reference to the relevant legislation under which the Appropriate Assessment process was carried out in Part A: Appendix I - 1.3 <i>Strategic Environmental Assessment and Appropriate Assessment</i> of the CDP.
(y)	It is recommended to review the EPAs State of the Environment (SoE) Report - <i>Ireland's Environment-An Assessment 2016</i> with specific reference to Chapter 16 of the SoE report which identifies key challenges for Ireland and include relevant objectives and policies in the CDP to address key environmental challenges if deemed necessary

Recommendation 2:

It is recommended to review Section 7 of the Environmental Report 'Flood Risk' having regard to the findings of the Stage 1 Strategic Flood Risk Assessment (SFRA) which is currently being prepared in-house. It is noted that the Stage 1 SFRA may include recommendations for particular amendments to the CDP and the Environmental Report that may give rise to material alterations.

Recommendation 3:

In light of the recommendation under Section 3.7 of this Report to incorporate the technical standards for Wind Energy into the objectives and policies in Section 8.2 of the Plan, which will result in material alterations, it is recommended that a SEA and AA will be required to be carried out on the suggested amendments.

3.12 Themed response on site specific zoning requests

This section provides a response in relation to each site specific zoning request.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
LAYER 1					
Letterkenny					
1.	P08	Port Road (Adjacent to LYIT)	Re-zoning from 'Community/ Education' to 'Established Development'.	The County Development Plan is strategic in nature. The assessment of any specific proposals to amend the zoning of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
2.	P10	Kiltooy	Re-zoning of lands from 'Strategic Residential Reserve' to 'Residential Phase 1'.	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
3.	P13	Carnamuggagh Lower, Letterkenny	Re-zoning of lands from 'Strategic Residential Reserve' to 'Residential Phase 1'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
4.	P18	Lios Na Greine, Lisnennan	Re-zoning of lands from 'Strategic Residential Reserve' to 'Primarily Residential'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
5.	P22	Ballaghaderg, Letterkenny	Inclusion of lands within the 'Letterkenny Plan boundary' and zoning for 'Residential' or 'Strategic Residential Reserve'.	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes or to revise the settlement boundary should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
6.	P31 (no map submitted but site identified from	Creevesmith, Letterkenny	Inclusion within the Development Plan of lands with planning permission for	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general	No change.

Layer/ Settlement	Subm.(s) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
	planning permission ref no. 06/80149		174 houses.	housing purposes or to revise the settlement boundary should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
7.	P46	Knockybrin	Inclusion of lands within the Letterkenny boundary.	The County Development Plan is strategic in nature. The assessment of any specific proposals to amend the zoning of particular sites or to revise the settlement boundary should only be made in the context of a detailed and comprehensive assessment of the zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
8.	P48	Port Road, Letterkenny	Omission of; 1. Link road proposal 2. Relocation	Concerns noted. The road link referred to is of the highest strategic importance for Letterkenny and the wider region and is identified as a key priority construction project for the TEN-T national road network in the County. The project is the subject of a review at present by the Transport Infrastructure Ireland and	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			of proposed roadway to maximise use of lands.	alterations to the identified road line would be premature pending the outcome of the said study. It should be noted that one such outcome may be that the routes remain unchanged and thus the capacity to facilitate the requests made in the submission may not be available.	
9.	P51	Woodlands, Letterkenny	Inclusion of lands within plan boundary and zone as 'Established Development'	The County Development Plan is strategic in nature. The assessment of any specific proposals to amend the zoning of particular sites or to revise the settlement boundary should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
10.	P60	Cluain Airne, Glebe, Letterkenny (no map submitted)	Re-zoning of lands from 'Strategic Residential Reserve' to 'Residential'.	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
11.	P67, P95	Ballyraine, Letterkenny	Amendment of Plan to provide for 'Residential Phase 1' on a portion of the site Opp 16. Phase 1	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
12.	P82	Lands on southern side of River Swilly.	Identification of a 'Strategic Growth Area' on the southern side of River Swilly.	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals for strategic expansion of the town or to amend the zoning of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carrdonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
13.	P91	Mountain Top lands, Letterkenny	Retain zoning of lands for 'Commercial' use as per the Letterkenny and Environs Development plan, 2009-2015	The County Development Plan is strategic in nature. The assessment of the specific zoning of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carrdonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
14.	P92	Ballyraine area adjacent to LYIT	1. No expansion by LYIT towards Ballyraine area. 2. No commercial developments in the Ballyraine area.	The County Development Plan is strategic in nature. The assessment of any specific proposals to amend the zoning of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carrdonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe).	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
15.	P96	Ballyraine, Letterkenny	Rezoning of lands from 'Educational' to 'Primarily Residential'	<p>The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe).</p> <p>Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.</p>	No change.
16.	P104	Castlebane, Letterkenny	Rezoning of lands from 'Strategic Residential Reserve' to 'Primary Residential Phase 1'.	<p>The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the</p>	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
17.	P110	Ballyraine, Letterkenny	1. Zoning of site as 'General Employment' 2. Inclusion of a new access route through these lands from Ballyraine Road to the N56 Relief Road.	The County Development Plan is strategic in nature. The assessment of any specific proposals to amend the zoning of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
18.	P150	Kiltoy, Letterkenny	Re-zone from 'General Employment' to ' Primary Residential'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
19.	P151	Windyhall, Letterkenny	Re-zone lands from 'Local Environment' to 'Strategic Residential Reserve'.	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
20.	P159	Creevesmith, Letterkenny	Rezoning of lands from 'Strategic Residential Reserve' to 'Residential Phase 1	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
21.	P229	Cornagil, Letterkenny	Inclusion of lands within the Settlement boundary.	The County Development Plan is strategic in nature. The assessment of any specific proposals to amend the zoning of particular sites or revise settlement boundaries should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	No change.
22.	P261	Creevesmith, Letterkenny	Rezoning of lands from 'Established Development' to 'Primarily Residential'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs)	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carrdonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Letterkenny Local Area Plan is programmed to commence at the start of 2018.	
LAYER 2A					
Ballybofey/ Stranorlar					
1.	P15	Drumboe Woods, Stranorlar	Removal of 'Amenity' zoning from a small area on the edge of Drumboe Woods.	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
2.	P25	Cappry,	Rezoning of white land within the settlement boundary to 'Residential'.	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
3.	P40	Navenny,	Rezoning of white land within the designated settlement boundary to 'Residential'.	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
4.	P54, P62, P63,	Dunwiley Woods,	Preservation of Dunwiley Wood as an	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
	P73, P101, P172, P177, P197		'Amenity Area'		
5.	P76	Admiran, Stranorlar.	Rezoning of white land within the designated settlement boundary to 'Residential'.	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
6.	P154	Ballybofey	Submission for zoning of Industrial lands	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
7.	P176	Castlebane, Stranorlar	Removal of 'Amenity' zoning	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
8.	P232	Windmill View, Ballybofey- Stranorlar	Re zoning of lands for mix of Retail, Small Manufacturing and Storage.	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
9.	P270	Ballybofey- Stranorlar	Rezoning of 'Amenity' to 'Residential development'	This is a detailed issue most appropriately considered under the Ballybofey/Stranorlar LAP. The draft LAP is expected to be published mid-November 2017.	No change.
Buncrana					
1.	P07, P14, P20	Cockhill Road	Re-zoning of lands from 'Amenity/Recre	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			ation' to 'Residential'.	<p>housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Buncrana Local Area Plan is programmed to commence during 2018.</p> <p>The re-zoning of the subject lands for 'Amenity/Recreation' was carried out in accordance with all the statutory notification and consultation procedures during the preparation of the Buncrana Development Plan. These procedures are centred on public consultation and do not require individual owners to be notified of specific proposals for their property. The 'Amenity/Recreation' zoning should not be interpreted as an expressssion by Donegal County Council of any desire to enforce the availability of the site for public access/amenity. Rather, it reflects the fact that, having taken the decision to delete the site from its housing land supply, other uses are not readily identifiable.</p>	
2.	P34	Clonbeg, Tullyarvan, Buncrana	Re-zoning from 'Strategic Residential Reserve' to 'Residential Phase 1'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				detailed and comprehensive assessment of the overall land supply and zoning situation in Buncrana and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Buncrana and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Buncrana Local Area Plan is programmed to commence during 2018.	
3.	P77	Rockytown Road, Ballymacarry, Buncrana	Submission relates to rezoning of lands from 'Strategic Residential Reserve' to 'Primary Residential'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Buncrana and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Buncrana and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Buncrana Local Area Plan is programmed to commence during 2018.	No change.
4.	P85	Cockhill Road, Buncrana	Amend zoning of lands zoned for 'Infrastructure'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Buncrana and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Buncrana and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Buncrana Local Area Plan is programmed to commence during 2018.	
5.	P155	St. Orans Park, Buncrana	Retaining lands as 'Amenity/Recreation'	The County Development Plan is strategic in nature. The assessment of any specific proposals for the zoning, or the retention (continuation) of zoning, of particular sites should only be made in the context of a detailed and comprehensive assessment. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Buncrana and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Buncrana Local Area Plan is programmed to commence during 2018.	No change.
6.	P228	Tullyarvan, Buncrana	Rezoning of lands from Agriculture to 'Primarily Residential'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Buncrana and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Buncrana and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Buncrana Local Area Plan is programmed to commence during 2018.	
7.	P283	St. Oran's Park, Buncrana	Retain lands zoned as 'amenity/recreation'	The County Development Plan is strategic in nature. The assessment of any specific proposals for the zoning or retention (continuation) of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Buncrana Local Area Plan is programmed to commence at the start of 2018.	No change.
Bundoran					
1	P111	Magheracar, Bundoran	Zoning of lands for 'Residential Phase 1'	The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites for general	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				housing purposes should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe). Preparation of the Bundoran Local Area Plan is programmed to commence at the start of 2018.	
Carndonagh					
1.	P29	Malin Road, Carndonagh	Inclusion of lands within the Settlement Envelope	This is a detailed issue most appropriately considered under the Carndonagh LAP. The draft LAP is expected to be published mid-November 2017.	No change.
2.	P35	Tulnaree, Carndonagh	Inclusion of lands within the Settlement Envelope	This is a detailed issue most appropriately considered under the Carndonagh LAP. The draft LAP is expected to be published mid-November 2017.	No change.
3.	P39	1. Pound Street/Old Moville Road 2. North of Costcutter supermarket	1. Identification of lands 'in-fill development'. 2. Zoning of lands for 'Residential Development'	These are detailed issues most appropriately considered under the Carndonagh LAP. The Draft LAP is expected to be published mid-November 2017.	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
		3. Barrack Hill	3. Zoning of lands for 'Residential Development'		
		4a. Derry Road adjacent to Cill Bhríde and Ard Bhríde DCC housing scheme	4. Zoning of lands for 'Residential'		
		4b.	4b. Zoning of field to south of girls primary school for 'Education'		
		5. Merville Road between new by-pass road and Glengannon River.	5. Inclusion of lands within the Settlement Envelope		
4.	P157	Carndonagh	Inclusion of lands within the Settlement Envelope	This is a detailed issue most appropriately considered under the Carndonagh LAP. The draft LAP is expected to be published mid-November 2017.	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			(No Map included)		
5.	P194	Carndonagh	Inclusion of lands within the Settlement Envelope	This is a detailed issue most appropriately considered under the Carndonagh LAP. The draft LAP is expected to be published mid-November 2017.	No change.
6.	P246	Churchlands Quarters, Carndonagh.	Retain lands within the 'Settlement Envelope'	This is a detailed issue most appropriately considered under the Carndonagh LAP. The draft LAP is expected to be published mid-November 2017.	No change.
Donegal Town					
1.	P27	Doonan, Donegal Town	Rezoning of white land within the designated Donegal Town settlement boundary to 'Residential'	This is a detailed issue most appropriately considered under the Donegal Town LAP. The draft LAP is expected to be published mid-November 2017.	No change.
2.	P89 (no map submitted)	Ballyboyle, Donegal Town	Inclusion of lands within the Settlement Envelope	This is a detailed issue most appropriately considered under the Donegal Town LAP. The draft LAP is expected to be published mid-November 2017.	No change.
3.	P109	Drumroosk, Donegal Town	Zoning of lands to 'Residential'	This is a detailed issue most appropriately considered under the Donegal Town LAP. The draft LAP is expected to be published mid-November 2017.	No change.
Killybegs					
1.	P105	Roshin, Killybegs	Re-instatement of lands	This is a detailed issue most appropriately considered under the Killybegs LAP. The draft LAP is expected to be published mid-November 2017.	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			previously zoned for tourism in the Killybegs LAP 2008-2014 but omitted from the Draft Plan Settlement Framework boundary.		
2.	P273	Killybegs	Extension of boundary line lands be zoned as 'Enterprise (Industrial/ Employment).	This is a detailed issue most appropriately considered under the Killybegs LAP. The draft LAP is expected to be published mid-November 2017.	No change.
LAYER 2B					
Dunfanaghy					
1.	P189	Dunfanaghy	The submission provides a Site Appraisal for parking areas of the Market Square and Harbour Area together with a proposed shore walk and cycle coastal route and	This submission provides an appraisal of various locations within Dunfanaghy in terms of their potential for parking, pedestrianisation and for the provision of walking/cycling routes. Whilst the contents of this submission are noted, the suggestions contained therein may be more appropriately targeted via an Area Action Plan or similar initiative for Dunfanaghy rather than within the strategic policy document that is the County Development Plan.	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			renovation of the Market house as the central attraction		
Glenties					
1.	P17	Gortnamucklag h, Glenties	Inclusion of lands within the settlement boundary.	<p>This site currently has the benefit of planning permission for a housing and nursing home development.</p> <p>The principle of this class of development on these lands is already established. An alteration to the policies set out in the Draft Plan as proposed do not require further modification.</p> <p>No amendment proposed.</p>	No change.
Moville					
1.	P78	Gulladoo, Moville	<p>A) Inclusion of 2 plots currently outside of Settlement boundary to within settlement boundary and zoning for 'Residential development'.</p> <p>B) Zoning of a plot already within settlement boundary for</p>	<p>The three plots subject of this submission total 5.87 acres in area. Plots 1 and 3 are located outside of the settlement boundary of Moville as defined in the Draft Plan, whilst Plot 2 is located within the settlement boundary. The submission requests that the plot located within the boundary be zoned for residential purposes and that the plots currently outside the boundary be located within said boundary and also zoned for residential purposes.</p> <p>Moville is a Layer 2B settlement. The approach in the Core Strategy of the Draft Plan is not to provide any prescribed residential zonings in 2B settlements in order to provide flexibility in the approach towards residential development. For this reason, no re-zoning is recommended in this case. 'Plot 2' would of course be open to consideration for residential development subject to compliance with all other relevant policies and standards.</p> <p>With regard to the proposal to extend the settlement boundary to include Plots 1 and 3; it should be noted (a.) that Moville</p>	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			'Residential development'	wastewater treatment plant is currently awaiting an upgrade as part of the Irish Water Capital Investment Plan 2017-2021 and until such time as these works are complete it would be premature to extend the settlement boundary; and (b.) vacant lands already exist within the settlement boundary that may be suitable for housing development, subject to compliance with all other relevant policies and standards. In light of these facts, no settlement boundary extensions are recommended in Moville.	
2.	P79	Glencrow, Moville	<p>A) Zoning of a plot already within settlement boundary for residential development</p> <p>B) Inclusion of adjacent plot currently outside of Settlement boundary to within settlement boundary and zoning for residential development.</p>	<p>The land subject of this submission comprises 7.9 acres, with 4.9 acres within the settlement envelope of Moville (as defined in the Draft Plan) and 3 acres outside. The submission requests that the plot located within the boundary be zoned for residential purposes and that the plot currently outside the boundary be located within said boundary and also zoned for residential purposes.</p> <p>Moville is a Layer 2B settlement. The approach in the Core Strategy of the Draft Plan is not to provide any prescribed residential zonings in 2B settlements in order to provide flexibility in the approach towards residential development. For this reason, no re-zoning is recommended in this case. The lands currently within the settlement envelope (as defined in the Draft Plan) would of course be open to consideration for residential development subject to compliance with all other relevant policies and standards.</p> <p>With regard to the proposal to extend the settlement boundary to include additional lands for residential development, it should be noted (a.) that Moville wastewater treatment plant is currently awaiting an upgrade as part of the Irish Water Capital Investment Plan 2017-2021 and until such time as these works are complete it would be premature to extend the settlement boundary; and</p>	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				(b.) vacant lands already exist within the settlement boundary that may be suitable for housing development, subject to compliance with all other relevant policies and standards. In light of these facts, no settlement boundary extensions are recommended in Movice.	
3.	P116	Movice Pier	A) Public amenity/open access status be granted to Movice Pier. B) Right of Way from Bath Green to Movice Pier be 'Maintained and not obstructed.	This matter is addressed in the themed response to Tourism.	No change.
4.	P236	Movice	Rezoning of lands outside settlement to facilitate the development of a nursing home and affordable housing	Policy CCG-P-1 of the Draft Plan sets out the position as regards nursing home developments in the County. In the first instance, such facilities should be provided 'within safe walking distance (i.e. via an existing or proposed footpath) of local services and residential areas and which would otherwise promote social inclusion'. The site subject of the submission is located in a somewhat peripheral location relative to the town centre and it is not considered than an extension of the settlement boundary would be appropriate in this case. Notwithstanding, Policy CCG-P-1 of the Draft does provide for exceptions where there are no suitable sites available within the settlement envelope and it may be the case that the site falls under these policy provisions. With regard to extending the settlement boundary to provide for	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
				housing development on these lands, it must be noted (a.) that Moville wastewater treatment plant is currently awaiting an upgrade as part of the Irish Water Capital Investment Plan 2017-2021 and until such time as these works are complete it would be premature to extend the settlement boundary; and (b.) vacant lands already exist within the settlement boundary that may be suitable for housing development, subject to compliance with all other relevant policies and standards. In light of these facts, no settlement boundary extensions are recommended in Moville.	
Ramelton					
1.	P152	Newmill, Ramelton	Inclusion of lands within the settlement boundary.	<p>This submission seeks the inclusion of approximately 2.2 hectares of land within the settlement framework boundary for Ramelton, with a view to potentially providing services sites or small scale residential development including social housing.</p> <p>Planning Ref. 06/51538 refers to a previous decision to refuse permission for a residential development on this site.</p> <p>Planning Ref. 09/40298 also refers to a previous decision to refuse permission for a residential development on this site.</p> <p>Ramelton is currently included on the EPA list of sites with no wastewater treatment. A project is underway to provide a common WWTP serving Rathmullan, Ramelton and Milford but until such time as adequate infrastructure is in place the extension of the settlement boundary to provide for additional residential development would be premature.</p>	No change.
Layer 3					
Convoy					
1.	P75	Kiltole, Convoy	Inclusion of lands within the settlement	The lands have been the subject of a previous permission for multiple development and is located in a position in Convoy that is integral to the existing pattern of development, is accessible	Recommendation: It is recommended that a minor

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			boundary.	through existing housing access roads and the improvements to waste water treatment capacity are ongoing. It is recommended that a minor adjustment to the settlement framework boundary is made to include this parcel of land. This is a material amendment.	adjustment to the settlement framework boundary of Convoy is made to include a parcel of land as shown on the Map contained in Appendix B of this report. This is a material amendment.
Killygordon					
1.	P195	Killygordon Village	Amend zoning of lands for 'Residential'.	The proposed site is largely outside the settlement framework boundary for Killygordon where there is a deficiency in waste water treatment infrastructure. Accordingly the consideration of these lands for residential use would be premature and would not be in the interests of orderly development at this stage.	No change.
Loughanure					
1	P231	Loughanure	Inclusion of lands within the settlement boundary and zoning for completion of a partially completed residential development	The proposed site is outside the settlement framework boundary where there is inadequate infrastructure to cater for multiple housing development. Accordingly the consideration of these lands for residential use would not be in the interests of orderly development at this stage.	No change.
Manor-cunningham					
1.	P57	Manorcunningham	Inclusion of lands within the settlement	The proposed site is outside the settlement framework boundary where there is inadequate infrastructure to cater for commercial development, is influenced by it's proximity to the national road	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			boundary and zoning for 'Commercial'.	network where any further intensification of traffic at this location has the potential to negatively impact on the carrying capacity of the N13. The area is adequately served by the supply of existing commercially zoned and serviced lands to cater for future anticipated commercial development. Accordingly the consideration of these lands for commercial use would not be in the interests of orderly development at this stage.	
2.	P208	Manorcunningham	Inclusion of lands within the settlement boundary.	The proposed site is outside the settlement framework boundary where there is inadequate infrastructure to cater for commercial development, is influenced by its proximity to the national road network where any further intensification of traffic at this location has the potential to negatively impact on the carrying capacity of the N13. The area is adequately served by the supply of existing commercially zoned and serviced lands to cater for future anticipated commercial development. Accordingly the consideration of these lands for commercial use would not be in the interests of orderly development at this stage.	No change.
Milford					
1.	P242	Milford	Inclusion of lands within the settlement boundary.	The proposed site is outside the settlement framework boundary where there is inadequate infrastructure to cater for commercial development and is proposed at a location that has the potential to negatively impact on the commercial vitality of the existing town centre in Milford. Accordingly the consideration of these lands for commercial use would not be in the interests of orderly development at this stage.	No change.
2.	P244	Milford	Inclusion of lands within the settlement boundary.	The proposed site is outside the settlement framework boundary for Milford where there is a deficiency in waste water treatment infrastructure and where there is little evident housing demand. Accordingly the consideration of these lands for residential use would be premature and would not be in the interests of orderly and sustainable development at this stage.	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
Mountcharles					
1.	P156	Mountcharles	Inclusion of lands within the settlement boundary.	The proposed site is outside the settlement framework boundary for Mountcharles where the lands are generally not served by public infrastructure and where there is little evident housing demand. Accordingly the consideration of these lands for residential use would be premature and would not be in the interests of orderly and sustainable development at this stage.	No change.
Muff					
1.	P233	Muff	Retain zoning as 'Opportunity site.	The lands are within the settlement framework for Muff and retain flexibility for the consideration of mixed use development that contributes to the future growth of Muff. It is not recommended to make the proposed amendment as the Draft Plan as published makes sufficient provision for the future development opportunities in this location.	No change.
Open Countryside					
1.	P205	McFaddens to Kilmacrennan	Amend speed limit on N56 and proposes a car park	Not a strategic Planning issue. The issue needs to be referred to the Director of Road and Transportation	No change.
2.	P66	Carrownamaddy	Zoning (unstated) of land should be lifted	This submission refers to a plot of land in the rural townland of Speenogue and requests that a zoning (unspecified) be applied to said land. No zonings are being applied in rural areas throughout the County and hence no changes are recommended to the Draft Plan in this respect.	No change.
3.	P74	Lacknaco, Churchill	Allow development (unstated but assumed for single house)	This submission relates to a rural site in Lacknaco, Churchill and requests that development of a dwelling be allowed on these lands. As the site is located in a rural area, any application for a dwelling	No change.

Layer/ Settlement	Subm.(s) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			of this land as previously granted in 1999.	would be subject to the Rural Housing Policies of the CDP and all other relevant criteria. No changes to the Draft Plan are recommended on foot of this submission.	
4.	P106	Magheraclogher, Bunbeg	Inclusion of lands within the settlement boundary.	The proposed site is outside the settlement framework boundary where there is inadequate infrastructure to cater for multiple housing development. Accordingly the consideration of these lands for residential use would not be in the interests of orderly development at this stage.	No change.
5.	P193	Ardeelan Lower, Rossnowlagh	Rezoning of lands for 'Residential development'	As is the case with other Tier 3 settlements where there is no prescriptive residential zonings it is not proposed to specifically depart from this strategy in this case. In this context individual multiple housing proposals will be assessed on merit based on infrastructural provision, and all other relevant planning considerations.	No change.
6.	P206	Culineen, Redcastle	Submission relates to development of specific site.	The proposed site is in a rural area where there is inadequate infrastructure to cater for multiple development. Accordingly the consideration of these lands for multiple residential in a rural area would not be in the interests of orderly development.	No change.
7.	P212	Drung, Redcastle	Submission relates to development of specific site.	The proposed site is in a rural area where there is inadequate infrastructure to cater for multiple development. Accordingly the consideration of these lands for multiple residential in a rural area would not be in the interests of orderly development.	No change.
8.	P248	Kinnalargy and Rosapenna, Downings	Amend policy on Holiday Homes for a specific site	The proposed site is in a rural area where there is inadequate infrastructure to cater for multiple development. Accordingly the consideration of these lands for multiple residential in this sensitive coastal rural area would not be in the interests of sustainable or orderly development.	No change.
9.	P259	Church Meadows, Dunfanaghy	Submission relates to development	As is the case with other Tier 2b settlements where there is no prescriptive residential zonings it is not proposed to specifically depart from this strategy in this case. In this context individual	No change.

Layer/ Settlement	Subm.(s)) Ref. No'(s)	Location	Proposal/ Request	Response	Recommendation
			of specific site in relation to an unfinished estate.	multiple housing proposals will be assessed on merit based on infrastructural provision, and all other relevant planning considerations.	
10.	P266	Land between An Grianan Of Aileach and the main road between Burt Chapel and St Marys Hall	Area of land be designated as an area of 'Especially High Scenic Amenity'	The lands indicated in the submission (but not mapped) are characterised by a dispersed pattern of residential, civic and commercial development where there is little merit in applying a designation of the type proposed in the submission. EHSA lands are normally characterised as "sublime natural landscapes of the highest quality that are synonymous with the identity of County Donegal". On this basis and through an objective assessment of the area indicated in the submission it is not proposed to redesignates areas at this location as an EHSA landscape.	No change.

4 Collation of Material Alterations

This section collates the material alterations that have been recommended throughout this report.

Material Alteration Ref No	Material Alteration	Relevant Themed Response from which the Material Alteration Arises
1	<p>To insert an additional objective into chapter 2, section 2.10, as CS-O-17 page 24 so that it reads as follows (new text shown in blue, text to be deleted shown in strikethrough):</p> <p>CS-O-17: To review the location and extent of lands zoned 'Strategic Residential Reserve' to ensure the appropriate supply of long term housing landbank.</p>	Themed Response on Core Strategy
2	<p>To amend table 2.3, section 2.3.3, chapter , page 16 so as to insert Portnablagh as a named town within 'Layer 3 Rural Towns and open Countryside' and therefore in addition to:</p> <ul style="list-style-type: none"> (i) Amend Table 15.2 of Part C, page 93 so as to insert Portnablagh as Map 15.60 and; (ii) Insert an additional Settlement Framework map for Portnablagh as shown on the map contained in Appendix B of this report into the Layer 3 Settlement Framework maps contained in Part C. 	Themed Response on Core Strategy
3	<p>To insert a new policy as UB-P-29 at section 6.2.3, chapter 6, page 100 so as to read as follows (NB: New text shown in blue and text to be deleted shown in strikethrough):</p> <p>It is a policy of the Council that holiday home development will be considered within the settlement framework areas without the application of a restriction in terms of the balance between holiday homes and permanent homes (policy UB-P-24), subject to environmental and heritage designations and amenity considerations and where the applicant can demonstrate that the site is a brownfield site within the urban fabric of a settlement framework and its development for holiday home purposes is of a size and scale that would not be detrimental to the character of the settlement. A brownfield site is one that has been previously built upon. It excludes parks, recreation grounds, private or public open space, allotments, forestry lands/buildings agricultural lands and land where the remains of the previous use have blended into the landscape, or have been superseded by landuse zonings or lands of conservation value or amenity use.</p>	Themed Response on Core Strategy
4	<p>In view of the themed response on Renewable Energy, it is considered that the Wind Energy section of the Draft Plan does not accord with the proper planning and sustainable development of the area and accordingly Members should not adopt the said Chapter but should instead adopt the Wind Energy Objectives and Policies including the associated mapping contained in the Working Draft Plan submitted to Members in March, 2017.</p>	Themed Response on Renewable Energy

Material Alteration Ref No	Material Alteration	Relevant Themed Response from which the Material Alteration Arises
5	<p>c) Move the contents of Section 10.6.5 currently placed in 'Development Guidelines and Technical Standards', Appendix 3, Part B from that Section 8.2, Renewable Energy contained in Chapter 8: Natural Resource Development</p> <p>d) Review the Environmental Report and Appropriate Assessment in light of both the change as recommended at 'a.' above and also the insertion of the additional Objective and text as recommended on Recommendations 3 and 4 below.</p>	Themed Response on Renewable Energy
6	<p>Insert a new Objective at Section 8.2.2 to reflect the requirement set out in the Interim Guidelines:</p> <p>Objective E-O-7: It is an Objective of the Council to promote sustainable development and transportation strategies in urban and rural areas including the promotion of measures to:</p> <ul style="list-style-type: none"> (iv) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources; (v) reduce anthropogenic greenhouse gas emissions; and (vi) address the necessity of adaptation to climate change.' 	Themed Response on Renewable Energy
7	<p>Amend Map 8.2.1 to identify the site of planning permission ref. no. 14/51400 from 'Not Acceptable' to 'Acceptable for Augmentation'.</p>	Themed Response on Renewable Energy
8	<p>Insert new Objective at Section 9.1.2: Objectives, Chapter 9-Tourism so that it reads as follows:</p> <p>'To support the development of a coastal greenway between Falcarragh and Bunbeg.'</p>	Themed Response on Tourism
9	<p>Insert an additional bullet at Objective MRCM-O-1 at Section 10.2: Objectives, Chapter 10-The Marine Resource and Coastal Management.</p> <p>To maximise the social and economic potential of Donegal's marine sector by:</p> <ul style="list-style-type: none"> ▪ 'Supporting the offshore primary production sector of the aquaculture industry, subject to adequate environmental assessments and safeguards being provided to the satisfaction of the Council and to the avoidance of the development giving rise to an overbearing visual impact in the locality in which it is proposed.' 	Themed Response on Marine Resource and Coastal Management

Material Alteration Ref No	Material Alteration	Relevant Themed Response from which the Material Alteration Arises
10	It is recommended that a minor adjustment to the settlement framework boundary of Convoy is made to include a parcel of land as shown on the Map contained in Appendix B of this report.	Themed Response on Site Specific Zoning Requests

Appendix A to the Chief Executive's Report on submissions received in respect of the Draft County Donegal Development Plan 2018-2024

**Summary of the issues raised in
each Individual submission (and
response and recommendation
where appropriate)**

October 2017



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

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1 Summary of the issues raised in the prescribed bodies submissions

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
PBO1	Transport Infrastructure Ireland (TII)	<ol style="list-style-type: none"> 1. TII advises that it seeks to address issues concerning the safety, capacity and strategic function of the national road network in accordance with TII's function and the provisions of official policy. Welcomes reference to the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012), and the inclusion of Road Schemes in Table 5.1. Also acknowledges that the Draft Plan addresses the EU TEN-T objectives. Notwithstanding, TII makes a number of recommendations. 2. Spatial Planning and National Roads Guidelines for Planning Authorities: <ol style="list-style-type: none"> a) Notes the contents of Policy T-P-4 (restrictions on access onto National Roads), and is of opinion that Policy is 'consistent with the provisions of the Guidelines'. Also welcomes clarification in Policy T-P-4 that development of national/regional strategic importance may be considered in 'exceptional circumstances', subject to such development being provided for through the Local Area Plan or Development Plan process. However, whilst welcoming the clarification, TII goes on to state that any such proposals for 'exceptional circumstances' for incorporation in subsequent Local Area Plans should be prepared in accordance with the provisions of Section 2.6 of the Guidelines. (Nb. the essence of the aforementioned Section 2.6 is that such proposals should be identified only after a substantive consultation and evidence-gathering process involving TII; and thus TII goes on to state that: 'TII is available to assist the Council in the development of proposals for consideration as 'exceptional circumstances' cases. b) Recommends that Policy ED-P-14 (economic development in rural areas) should have appropriate cross reference with national road policy by way of an additional criterion to as follows " <i>a) Is in accordance with policy on access to national roads outlined in Policy T-P-4 of this Development Plan.</i>" Similarly, suggests additional national road policy cross-references at: a) Chapter 6, especially Section 6.3, Rural housing; b) Chapter 8, Natural Resource Development; c) Chapter 9, Tourism; d) Chapter 11, Community, Culture and the Gaeltacht, particularly re community uses; and e) Part B: Appendix 3 Development Guidelines and Standards. c) Notes that Policy T-P-7 refers to the National Roads Authority's Design Manual for Roads and Bridges (DMRB) standards but advises that the DMRB has been superseded and that all relevant standards are now detailed in TII publications. 3. National Roads Projects: <ul style="list-style-type: none"> ▪ Unclear (if) all TII Major National Road Schemes are included and correctly referenced in Table 5.1 of Draft Plan. Recommends consultation with Donegal NRDO to ensure most up to date data is included prior to adoption. ▪ Makes a clear distinction between Major National Schemes, and national road schemes that are in addition to Major National Road Schemes and advises that while such additional improvements to national roads identified at a local level should be done in consultation with and subject to the agreement of TII, DCC will be aware that TII may not be responsible for the 	<ol style="list-style-type: none"> 1 to 3. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 4. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 and to themed response on core strategy and housing contained in section 3.1. 5. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 and to themed response on economic development contained in section 3.2. 6. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. In addition, the issues raised in relation to Letterkenny, Bundoran and the 7 towns covered by the forthcoming Draft LAP are matters for these more detailed programmes of work.

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		<p>funding of any such schemes or improvements.</p> <p>4. Specific Policies and Objectives:</p> <ul style="list-style-type: none"> ▪ Notes commitment to prepare LAPs for Strategically Located Towns (Chap. 2.5 and Core Strategy Objective CS-O-15 refer) and to prepare an Economic Baseline and Strategy report (Core Strategy Objective CS-O-11 refers). Requests that where implications for national road network arises, appropriate consultation with TII occurs. <p>5. Specific Policies and Objectives</p> <p>a) RETAILING: TII acknowledges support for concentrating retail uses in town centres and application of sequential test (Chapter 4.2) . However, also refers to the Retail Planning Guidelines (2012) and the 'explicit presumption' contained therein against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways. 'Would welcome this presumption against' such development being incorporated into Chapter 4.2.</p> <p>b) TRAFFIC AND TRANSPORT ASSESSMENT (TTA): Notes requirement for Traffic and Transport Statements to be completed in accordance with TTS 1 and TTS 2 but advises that while this is sufficient for minor roads, recommends that applications for significant development with implications for a national road should be accompanied by TTA prepared in accordance with the TII Traffic and Transport Guidelines (2014) and this should be referenced in Plan. -Section 2 Transport of Part B Appendix 3, recommends that references to NRA are updated to TII and reference to NRA DMRB are updated to 'TII publications'. (Also, similar references in Chapters 5 and 8 should be reviewed/updated)</p> <p>c) SIGNAGE: Notes that whilst TII policy document: 'Provision of Tourist and Leisure Signage on National Roads' is listed in Section 1.1 of Part B, Appendix 3: 'Development Guidelines and Technical Standards', would nevertheless welcome the incorporation of the provisions of the Policy into the (Tourism Chapter) of the Plan. Also references Section 3.8 of the DoECLG's Spatial Planning and National Roads Guidelines and the requirement therein to control the proliferation of non-road traffic signs on and adjacent to national roads.</p> <p>d) NOISE:: Requests Council to give consideration to including reference to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations. Recommends that development proposals identify and implement noise mitigation measures, where warranted, as TII will not be responsible for the provision of additional noise mitigation measures.</p> <p>6. Local Area Plans/Development Strategies:</p> <p>a) LETTERKENNY: Notes proposals outlined in Policy LK-P-T-3 (Nb. there is a typo here in the submission; should refer to LK-T-P-3) concerning a Multi-modal Strategic Link from Dry Arch Roundabout to the Port Road Roundabout. TII references this project as an example of a 'local scheme...with a potential to impact national roads'. Advises that the scheme should be developed in consultation with, and subject to the agreement of, TII. Scheme should be developed to safeguard the strategic function of the existing national road, and consideration should be given to co-ordination of the scheme with the N56 Letterkenny Relief road scheme. Would welcome consultation on this proposal. Also requests that development proposals on lands zoned as 'General Business/Opportunity Sites' in proximity to national roads are subject to</p>	

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		<p>TTA requirements in accordance with TII TTA Guidelines (2014) and would welcome the inclusion of this requirement in the text.</p> <p>b) BUNDORAN: Acknowledges text re development proposals on proposed East and West Gateway Opportunity Sites providing that direct access to N15 Bypass from the sites shall not be permitted. However, TII recommends that development proposals on these sites are subject to TTA and that this provision is incorporated into Development Plan. Also references DoECLG Retail planning Guidelines and the indication therein of a presumption against large scale retail developments adjacent or close to existing, new or planned national roads/motorways. On foot of this, TII suggests that DCC may wish to revisit development objectives.</p> <p>c) SETTLEMENT FRAMEWORKS: Refers to comments submitted during pre-Draft consultation re the requirement to co-ordinate proposed zoning designations and/or access strategies in the Plan with speed limits on national roads. Notes that Council will be aware of requirement outlined in Section 2.11 of the DoECLG Spatial Planning and National Roads Guidelines to have cognisance of speed limits when preparing Development Plan objectives. TII notes significant number of examples of proposed 'Settlement Envelope' in Layer 2 and 3 that extend along national roads outside location of reduced speed limits. Alongside this, TII notes associated objectives in Part B indicating that consideration will be given to certain development proposals within settlement envelopes. This introduces 'the potential for policy conflict' which should be addressed. TII considers that there is a requirement to review settlement envelopes and associated development objectives for all settlements along strategic road network to ensure compliance with the provisions of 'official policy'.</p> <p>d) BRIDGEND: TII notes 'Opportunity Site' identified along N13 at a location where the 100kph speed limit applies. Repeats point made earlier in general terms (refer para. 1a above) that the case for any proposal for access onto the national road falling to be considered under the 'exceptional circumstances' provision should be prepared in accordance with the provisions of Section 2.6 of the Guidelines. (Nb. the essence of the aforementioned Section 2.6 is that such proposals should be identified only after a substantive consultation and evidence gathering process involving TII; Proposals are required to comply with Section 2.5/2.7 of DoECLG Spatial Planning and National Roads Guidelines.</p> <p>e) SUMMARY: Concludes that there is a requirement to review 'Settlement Envelopes' with existing speed limits on national roads to ensure compliance with policy T-P-4 of the Draft Plan and 'official policy'. There is also a requirement to align 'Opportunity Sites' requiring access to national roads in accordance with Section 2.6 or 2.7 of DoECLG Spatial Planning and National Roads Guidelines to be subject to detailed consultation with TII and the preparation of the required evidence base prior to adoption of the Plan.</p>	
PB02	Heritage Council	<p>1. The Heritage Council would welcome the inclusion of 'effective landscape planning and management' as a priority in the Core Strategy and strategic objective of the plan and makes several suggestions in this regard including: the inclusion of the European Landscape Convention's definition of landscape in the Plan and inclusion of National Landscape Strategy 2015-2025 as part of policy context along with EU Maritime Spatial Planning Directive. The submission supports and commends the Landscape</p>	<p>1 to 3. Refer to themed response on core strategy and housing contained in section 3.1 and; to themed response on natural and built heritage and the environment contained in section 3.6 and; to themed response on the</p>

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		<p>Character Assessment (LCA), and is fully supportive of EU Hericoast project and states it would support further work on detailed historic landscape assessment.</p> <p>2. HC would welcome inclusion of annotated map illustrating socio-economic circumstances of the coastal areas and islands to help facilitate the planned maritime spatial planning, and inform strategic planning at a transboundary level.</p> <p>3. In relation to towns, the Heritage Council make the following comments:</p> <ul style="list-style-type: none"> ▪ Heritage Council would support heritage-led regeneration of towns including use of 'Town Centre Health Checks' and would be keen to collaborate with DCC and other partners. ▪ HC would support and input on the Letterkenny LAP (and other LAPs). ▪ The HC would be keen to progress collaboration on Public Realm Plans (PRP's) ▪ The HC would be keen to progress collaboration on Community –led Village Design Statements ▪ References all-island initiatives and would support stronger links with the walled city of Derry and its catchment. 	<p>marine resource and coastal management contained in section 3.9 of this report.</p> <p>Furthermore, the Heritage Council input into the preparation of a future LAP for Letterkenny is noted and welcomed.</p>
PB03	Derry City & Strabane District Council	<p>1. In relation to the Draft Development Plan documentation, DCSDC make the following comments:</p> <ul style="list-style-type: none"> ▪ Acknowledges the significant work undertaken by both DC&SDc and DCC arising from the challenges of Brexit, including the publication in February, 2017 of draft report '<i>Initial Analysis of the Challenges and Opportunities of Brexit for the Derry City and Strabane and Donegal County Council areas-The NW City Region</i>' ▪ Notes specific section in Draft CDP on the significant daily border crossings taking place in the North-West City Region. This evidences the high level of cross-border interactions in many areas of social/economic life and requires continued collaboration. ▪ DCSDC notes from their own Development Plan process the enabling role of Development Plans in identifying, coordinating and prioritising infrastructural investment and guiding location of economic development. ▪ Notes that the Development Plan highlights a role for settlements in driving significant economic development of the County by emphasising the importance of renewal and regeneration of the County's towns and villages where there are niche sectors, enterprise clusters or particular strengths etc. that can be harnessed. ▪ Notes that ongoing liaison between respective Planning Departments will be crucial for all stages of production of both Plans. Planning issues for adjacent border settlements in relation to their form and function, rural housing/landscape issues are key considerations. <p>2. In relation to the Environmental Report, DCSDC make the following comments:</p> <ul style="list-style-type: none"> ▪ Notes that much of the County and many offshore islands are covered by Natura 2000 sites. Satisfied with the content of Environmental Report. ▪ Finally, DCSDC acknowledges the Planning Liaison Group set up between both Planning officials of both Councils as further evidence of joint commitment to ongoing co-operation. 	<p>1. Refer to themed response on core strategy and housing contained in section 3.1 of this report and to themed response on economic development contained in section 3.2 of this report.</p> <p>2. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p>
PB04	The Department of Agriculture, Food and the Marine	<p>1. Advises that they have 'no submission or observations to make.'</p>	<p>1. Comments noted</p>
PB05	Geological Survey Ireland, Department	<p>1. The submission requests that in Ch 7 - The Natural and Built Heritage, Policy NH-P-19 (p 117) should include "...and the Geological Survey should be consulted..."</p>	<p>1 to 2. Refer to themed response on natural and built heritage and the environment contained in</p>

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
	of Communications, Climate Action & Environment, Geological Survey of Ireland,	<p>2. In relation to section D, the Environmental Report, the submission makes a number of comments as follows:</p> <ul style="list-style-type: none"> ▪ Requests that 2nd paragraph on p99 be replaced by the following; "<i>County Donegal has a long and interesting geological history. Inishtrahull, off the north coast, is the oldest part of Ireland as the rocks there have been dated at almost 1.8 billion years old. Most of the County is metamorphic schist and gneiss of the Dalradian Group formed in a major mountain building event over 450 million years ago at the closure of the lapetus Ocean. Granite bodies intruded into the metamorphic rocks mainly in the west of the county approximately 405 million years ago. Finally limestone rich in marine fossils formed in south Donegal in the Carboniferous period, approximately 360million years ago when Ireland was in the tropics. Donegal is cut by a series of south west-northeast trending faults including the Gweebarra fault in the north of the county. The landscape of County Donegal formed in the last glaciation over 12,000 years ago and many features of glacial erosion, transport and deposition are seen around the county including Barnesmore Gap</i>" ▪ That the title of the table5.13 (page 100) should be changed to "List of County Geological Sites" ▪ That, in section 8.1 Monitoring, Environmental Objectives, table 8.2 (p169) SL2: Protect and conserve geological sites. The word '<i>increase</i>' should be removed from the target column. ▪ Reference should be made to enhancing/promoting current sites. <p>3. The submission request that in Ch 9 - Tourism, that some reference to geo-heritage or geo-tourism could be included in Objectives TOU-O-2 (p139) and Policy TOU-P-1 (p141)</p>	section 3.6 of this report and also refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11.
PB06	Fermanagh & Omagh District Council	<p>1. Notes policy/zoning areas for consideration for proposed new, and alterations to existing, wind farm developments in Donegal and that some of the areas 'Open for Consideration' on Map 8.2.1 border two 'Areas of Scenic Quality (ASQ), Derrin Mountain and Lough Melvin, within their jurisdiction. States that both of these areas are potential Areas of High Scenic Value 'to be identified in the Councils draft Plan Strategy'. States that the Council has some concerns about the potential visual impact of any new wind farm development on these areas and requests that consideration be given to these concerns prior to adoption of the County Donegal Development Plan 2018-2024.</p>	1. Refer to themed response on renewable energy contained in section 3.7 of this report. In addition, the concerns raised can be addressed in the transboundary consultation procedures provided for in legislation.
PB07	Fáilte Ireland	<p>1. The submission from Fáilte Ireland is comprehensive and extensive and provides a broad overview that is generally supportive of the Draft Plan . The submission is generally positive, provides both commentary on the Draft Plan and proposed changes with suggested text to a number of policies/objectives.</p> <p>2. The opening section of the submission has identified key comments of the Draft Plan which commends the plan for zoning of 'tourist facilities', identifies tourism as a key priority, recognition of development potential of tourism, identification of 'strategic towns' performing 'special economic function', connectivity through all transport modes and tourism being a key economic driver. Other key comments of the initial section of the submission state that the vision statement (section 1.1) is positive but could include 'live, work, <u>visit</u> and enjoy'. Also, the submission would like to see references to tourism in the strategic objectives and policies.</p> <p>3. The following sections of the submission provide specific proposals and advise that proposed statements are based on identified gaps in policy coverage but commends the council on</p>	1 to 4. Refer to themed response on tourism contained in section 3.8 of this report. 5. Refer to themed response on renewable energy contained in section 3.7 of this report and also to themed response on the marine resource and coastal management contained in section 3.9.

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		<p>comprehensive coverage of the Wild Atlantic Way.</p> <p>4. The submission includes the following suggested amendments:</p> <ul style="list-style-type: none"> ▪ Proposed Text to be inserted in to 2nd paragraph section 9.1: (graphs on p135 to be updated for 2016) "Failte Ireland data indicates that County Donegal attracted approximately 283,000 overseas visitors in 2016, creating a revenue of €90 million. The County also attracted 370,000 domestic visitors in 2016, creating a revenue of €99 million. This demonstrates Donegal's potential as a tourism destination" ▪ Map 9.1 Icon removed as Ferry no longer in operation <i>but a passenger ferry is still operating.</i> ▪ p136 "The development of a visitor Experience Plan will be undertaken in support of policy objective" ▪ Page 137- Discovery points of 188 and not 181 ▪ Page 137- Mention of specific festivals by name to be removed. ▪ Page 139- bullet point 10 to include 'Looped walks' ▪ Proposed text to be inserted in paragraph 3 section 4.1.1 as follows, "The council will engage and collaborate with all relevant stakeholders to ensure the economic potential of the tourism sector is secured for the benefit of the local economy. In addition to the economic benefits associated with the sector, DCC is committed to protecting, promoting and enhancing the natural resources of the county making it a nicer place to live, work, visit and enjoy" ▪ Proposes incorporation of 5 core principles sustainability and proposes associated text to be included in Chapter 9, Tourism ▪ The submission refers to circa 50 policies/objectives in the Draft Plan with suggested alterations/ changes. The following is a list of these policies; ED-P-9, RS-O-1, RS-O-4, T-P-11, T-P-20/22, T-P-23, T-P-26, TOU-P-2, TOU-P-4, TOU-P-7, TOU-P-10, NH-O-1/11, NH-P-1/20, BH-P-3/5, MRCM-P-8/10 ▪ A number of new policies/objectives are also suggested. <p>5. The submission also addresses wind energy, aquaculture and town plans. Re wind energy, is generally supportive but cautions that such development should not 'adversely compromise the recreational amenity and environmental quality of inland and coastal areas.' Similar comments are made in relation to aquaculture. Concludes with general support for the inclusion of such a large number of Town Plans, and that it is encouraged by the inclusion of tourism and the WAW in a number of the economic development policies.</p>	
PB08	Northern Ireland Environment Agency	<p>1. In relation to biodiversity, makes the following comments:</p> <ul style="list-style-type: none"> ▪ States that policy NH-P-1 & 2 on p115 should clarify that this includes those features where there is a likelihood of development impacting a European site on both sides of the border. The submission also states that on p54-56 of the Environment Report, reference should be made to Fermanagh Development Plan and emerging Fermanagh and Omagh District Council Development Plan. On p82 DAERA would welcome consultation where Significant Effects are likely in relation to Article 10 'Stepping stones'. ▪ On Table 8.2 p168 in relation to compliance with Habitats Directive and the 15km buffer, the submission suggests that cross border Natura 2000 sites should be considered and not confined 	<p>1-4. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report and also to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11.</p> <p>5. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p> <p>6 to 7. Refer to themed response on the</p>

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
		<p>to Co. Donegal. In relation to Environmental Objective BI04 the submission suggests that protection of 'Macro corridors' and areas of contiguous habitat should take into account cross border linkages. On p173 Table 8.3, cross border linkage Natura 2000 sites should be safeguarded from damaging development. Objective BI01 should refer to trans-boundary obligations.</p> <ol style="list-style-type: none"> 2. The submission is generally content with Draft CDP in relation to the marine but has referred to the following; 'The Maidens' designated site should also be included in the AA screening. Although a 15km buffer has been used, the following ranges should be used when screening for seals: all SAC's within 135km of project/plan; 50km for Harbour seals. Reference should be made in the SEA section on Plans/Programmes to the UK Marine Policy Statement as they are shared waters including the transboundary Lough Foyle. 3. Regarding Climate Change, states that table on p44 should consider a) UK Climate Change Risk Assessment 2017; and b) NI Climate Change Adaption Programme 2014. 4. Regarding air quality states that within introduction on p5 (Air and Noise), the impact from residential emissions could feature here. On p142, annual means value would give more insight than single daily value. The submission also references significant environmental pressure from solid fuel and ammonia emissions from agricultural activities and that there is no air quality monitoring as an indicator but this should be considered. And significant solid fuel burning may take place in transboundary areas like Lifford/Strabane. 5. In relation to water quality states with a target of 36% rural housing growth, the submission states that the proliferation of septic tanks gives cause for concern in respect of achieving good status water quality on both sides of the border. Policy WES-P-11 on p76 addresses this issue. However the submission states that where cross water bodies are involved there is a necessity to liaise with the relevant authorities to ensure up to date data is available. 6. In relation to the historic environment, the submission welcome the commitment to refer to Northern Ireland's historic environment datasets through the SEA process outlined in Table 2.1 but it is unclear from the SEA report how these have been taken in account. The submission requests clarity in the adoption statement on how they were considered. The submission also raises concerns in relation to wind energy and that measures are in place that the settings of these assets are given appropriate consideration. 7. In relation to the Natura Impact Statement, the submission requests that any development impacting on cross border Natura 2000 sites should not be undertaken and consultation should be sought with DAERA regarding development in Donegal with significant effect on these sites. 	<p>Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p>
PB09	Inland Fisheries Ireland - Ballyshannon	<ol style="list-style-type: none"> 1. The submission by IFI provides an overview of its role and areas of responsibility and its functions as set out under section 7(3) of the IFI Act, 2010. 2. The submission welcomes the importance of environmental protection with the Draft CDP and fully supports the approach and supporting objectives as outlined in sections 5.2.2 and 5.2.3 respectively. The submission also states that IFI is conscious of the risks of flooding and recognises measures to minimise such events in objectives 5.4.2 and supporting policies 5.4.3 especially in light of changing rainfall patterns e.g. Letterkenny Hospital. 3. The submission refers to Section 8.2 'Energy' and suggests that reference should be made in relation 	<ol style="list-style-type: none"> 1. Noted. 2. Refer to themed response on flood risk contained in section 3.4 of this report. 3. Refer to themed response on renewable energy contained in section 3.7 of this report.

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		to small hydro schemes and that the document 'Guidelines on the Planning, Design, Construction and Operation of Small-Scale Hydro-Electric Schemes and Fisheries' should be specifically referenced and IFI is the lead authority in this area.	
PB10	Northern and Western Regional Assembly	<ol style="list-style-type: none"> 1. In relation to the National and Regional Context, the submission notes key context documents, namely the NPF consultation paper (Feb., 2017) and the State's new Capital Investment Plan. Advises on some of the key contents of its submission to the NPF as they refer to Donegal including the identification of the North-West City Region as a key catchment of the region, and also the Sligo City Region 'that has a natural hinterland that overlaps with that of the NW City Region'. The submission also references critical enabling projects (e.g. dualing of the N2./A5; upgrade of the Letterkenny-Lifford/Strabane road; and the upgrade of the N13 and N15 along the Atlantic Economic Corridor. Notes that, subject to advancement of the NPF, the NWRA will be formally commencing the preparation of the Regional Spatial & Economic Strategy (RSES) in Quarter 4 , 2017 and that, when the RSES is made, DCC may have to consider if a Variation to the CDP is required. Conclude this Section by advising that it may be of benefit to clearly state that it is the 3 settlements of Letterkenny, Derry AND Strabane that are at the core of the NW City Region (and not just the first two). 2. Regarding Part A (Strategic Contents), the submission makes the following comments: <ul style="list-style-type: none"> ▪ Accepts that the population projections are broadly in line with those outlined in the Regional Planning Guidelines, 2010 (RPG's), and sees the allocation of approximately 30% of the overall population increase to Letterkenny as 'reasoned'. ▪ Broadly supportive of the Core Strategy and proposed settlement hierarchy, in particular the focus on strengthening Letterkenny as a gateway centre and as a regional driver for growth, noting that this approach is broadly consistent with the National Spatial Strategy (NSS) and the RPG's. However, suggests that differentiation between role and function of Layer 2A and 2B towns could be better clarified clarify so that it understood that the strength of the sub-regional settlement lies within those settlements specified in Layer 2A. Also suggests referencing the regional Tourism function of Killybegs. ▪ Suggests review of Section 28 Statement in Appendix 2 to take account of: 1. the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines (Circular letter PL 5/2017); consistency of the Draft Plan with National Mitigation Plan (July 2017), and the Planning System and Flood Risk Management Guidelines (2009). ▪ Suggests reviewing the provisions in respect of flooding, having undertaken a Strategic Flood Risk Assessment. 3. Regarding Part B (i) (Infrastructure), the submission makes the following comments: <ul style="list-style-type: none"> ▪ Largely supports the transport infrastructure priorities set out in Chap. 5. Suggests inclusion of an additional objective that facilitates additional infrastructural requirements that may arise as a result of Brexit ▪ Review Walking/Cycling section with view to referencing Greenway links across the region and cross-border to form basis of an all-island greenway network 	<ol style="list-style-type: none"> 1 to 2. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 3. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 4. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 5. Refer to themed response on tourism contained in section 3.8 of this report.

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		<ul style="list-style-type: none"> ▪ Suggests re-consideration of the provisions for interim solutions to wastewater treatment for multiple developments where capacity does not exist and in consultation with appropriate bodies (IW, EPA) given experience of legacy issues. <p>4. Regarding housing, the submission makes the following comments:</p> <ul style="list-style-type: none"> ▪ Notes the (high) extent of housing vacancy in the County and, notwithstanding inclusion of various objectives in Plan to address this issue, suggests that the Plan would benefit from further detailed consideration of the vacancy rate, level of unfinished developments and extant permissions. In relation to this issue, suggests: consider a target in the Housing Strategy for the percentage of housing units to be provided by derelict/vacant buildings; and inclusion of necessary provisions within Plan to give effect to the Vacant Sites Register in accordance with Urban Regeneration and Housing Act, 2015 and the provisions of Circular PL5/2017 ▪ Suggests that Plan would benefit from clarification of the quantum of Strategic Residential Reserve (SRR) proposed & that consideration should be given to the inclusion of an objective to reduce the extent of SRR sites via LAP process <p>5. Regarding heritage, the submission welcomes the focus of the Plan on the heritage assets of the County, noting that Donegal is a significant national asset in this regard. Notes the 'further significant strides' made recently in the tourism sector in Donegal and suggests that, as well as identifying the successes within the County and the WAW and links to N.I., Plan should also incorporate the potential of the Western Seaboard and opportunities to link with Fermanagh, Leitrim, Cavan, Monaghan and beyond.</p>	
PB11	EPA	<ol style="list-style-type: none"> 1. Submission is intended to promote full and transparent integration of environmental considerations in the Plan and the integration of the Plan-making and SEA processes. 2. EPA recently published the State of the Environment (SoE) report - <i>Ireland's Environment-An Assessment 2016</i>. Chpt. 16 identifies key challenges for Ireland, including; Environment and Health and Wellbeing, Climate Change, Implementation of Legislation, Restore and Protect Water Quality, Sustainable Economic Activities, Nature and Wild Places and Community Engagement. Each of these findings are relevant in the context of the Plan; in particular sections on Natural and Built Heritage, Natural Resource Development, Marine Resource and Coastal Management, Infrastructure, Housing, Tourism. The Plan should include relevant objectives and policies to address key environmental challenges. 3. It appears that many of the proposed changes outlined in Table 10.1 of the SEA, <i>Incorporating Environmental Issues into the Plan</i>, have not been incorporated into the Plan. DCC should ensure that all mitigation measures outlined in SEA are fully integrated into CDP. 4. Part A: Appendix I - 1.3 <i>Strategic Environmental Assessment and Appropriate Assessment</i> - There would be merit in including a summary of key findings and recommendations of the SEA and AA, including mitigation measures, and how these have been integrated into the CDP. The inclusion of <i>Fig. 1.2 Vulnerability Mapping in County Donegal</i>, which provides a useful overview of sensitivities, could also be considered. 5. Energy - Proposal to introduce a minimum set-back distance of ten times tip height of proposed turbines is noted. This is contrary to guidance contained in the <i>Wind Energy Development Guidelines</i> 	<ol style="list-style-type: none"> 1 to 4. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report. 5. Refer to themed response on renewable energy contained in section 3.7 of this report. 6. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 7. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report. 8. Noted. 9 to 10. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report and also refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11. 11. Refer to themed response on flood risk

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		<p><i>for Planning Authorities (2009)</i>. DCC should ensure that the county wind energy strategy remains consistent with Dept. Guidelines once finalised. CDP should also be consistent with the recently published <i>Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (July 2017)</i>, with a view to ensuring the CDP is aligned with national policy and targets in relation to renewable energy and carbon neutrality.</p> <p>6. Infrastructure - <i>Table 5.1 Proposed Transportation Improvement Projects</i> is noted, along with various other development/infrastructure projects. All proposed development should be implemented in accordance with the requirements of the EIA, Habitats and Water Framework Directives. Implications of climate change and seismic activity should be taken into account.</p> <p>7. Green Infrastructure - Recommend that specific policies and objectives be included in Chpt. 11 for the protection of existing and the provision of new green infrastructure.</p> <p>8. Water Services - Table 2.4 outlining the strategic status of water services across Layers 1 and 2A is noted. Council's commitment to support and facilitate Irish Water in the timely delivery of infrastructure is welcomed. Appropriate water service infrastructure should be put in place to service any development in the Plan area.</p> <p>9. Water Quality - The Plan should include a stronger commitment to protecting and improving water quality, in accordance with the requirements of the WFD and in collaboration with relevant stakeholders. Ongoing monitoring of trends in water quality should be incorporated into SEA monitoring programme. EPA has recently launched www.catchments.ie, which would be a useful resource in terms of reporting on water quality.</p> <p>10. Bathing Waters - Consideration should be given to including specific policies/objectives in the Plan to protect bathing water quality in the county.</p> <p>11. Flood Risk - The inclusion of flood risk policies and objectives is acknowledged. There would be merit in consulting with the Dept. of Housing, Planning and Local Govt. and the OPW in relation to the approach outlined in Section 5.4 '...the Council considers that the Draft Flood Risk Management Plans for UoM 1, 35 and 36 and the associated Flood Hazard Mapping constitute a Strategic Flood Risk Management Plan for the County...'. There would also be merit in including a commitment in the Plan that Flood Risk Assessments (FRAs) will be carried out for the proposed LAPs and any key development sites / proposed infrastructural development locations considered within the Plan area.</p> <p>12. Coastal Management - EPA welcome the inclusion of the specific objectives relating to coastal zone management and coastal protection, included in Chapter 10. The Plan should also consider future climate change scenarios. The Plan should include provisions to protect ecological buffers/coastal wetlands/estuaries, to ensure that the effects of coastal squeeze on protected species and habitats can be managed appropriately. The potential role that estuaries and wetlands can play in flood alleviation, alongside traditional flood management measures, could also be highlighted.</p> <p>13. Section 2.9 outlines the proposed establishment of an Implementation and Monitoring Programme to identify and monitor the interventions undertaken to deliver on the core strategy etc. The SEA-related monitoring should be incorporated into this Implementation and Monitoring Programme.</p> <p>14. There would be merit in considering the discussion document for the preparation of a National Policy Statement on the Bioeconomy (Dept. of the Taoiseach July 2017), which is currently out for consultation. The inclusion of commitments in the Plan to promote relevant aspects of the</p>	<p>contained in section 3.4 of this report.</p> <p>12. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report</p> <p>13. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p> <p>14. Noted.</p> <p>15 to 17. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p> <p>18 to 19. Noted.</p> <p>20. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p> <p>21. This is a statutory requirement and is referenced across the Draft Plan.</p> <p>22. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report in section 3.6 of this report.</p> <p>23. Comments noted and provision has been made in the Draft CDP in relation to groundwater vulnerability and the security of source protection areas.</p> <p>24 to 25. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p> <p>26. Noted.</p> <p>27. Noted.</p>

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		<p>bioeconomy should be considered.</p> <p>15. The Non-Technical Summary (NTS) should fully take into account the requirements of Schedule 2B (h) of the SEA Regulations (S.I. No 436 of 2004). There would be merit in including Figure 1.2 Vulnerability Mapping in County Donegal in the NTS. The NTS should also include specific information on the proposed monitoring programme. Consideration should be given to including radon levels in the vulnerability mapping to identify areas where significant radon accumulations within the Plan area may occur.</p> <p>16. Climate Change Urgent action is needed to address climate change and to move Ireland towards a low carbon, climate resilient economy and society and climate change adaptation and mitigation measures should be included in the Plan as appropriate. The strategic environmental objective AC1: 'Support implementation of National Climate Strategy 2007-2012' should be updated to reflect the more recent National Policy Position on Climate Action and Low Carbon Development¹ adopted in 2014. In finalising the Plan, Donegal County Council should ensure that it is consistent with the National Policy Position. In addition, relevant aspects of the National Mitigation Plan, which was published on 19th July 2017 and includes 106 actions to advance the national transition agenda, should be incorporated into the Plan as relevant. There is merit in including a commitment in the Plan to preparing a Climate Adaptation Strategy for the county.</p> <p>17. In both Table 4.1: Assessment of Alternative Approaches to the Plan in the Context of the Strategic Environmental Objectives (SEO's) and Table 8.4: Assessment of Strategic Policy Objectives, the strategic environmental objective 'AC3' appears to have been omitted. An additional objective 'CM3' is included in these tables which are not referred to elsewhere in the report.</p> <p>18. EPA note the commitments to prepare a single LAP in respect of the towns and welcome the commitment that all proposed LAPs will be consistent with the Core Strategy of the Plan. The requirements of the SEA, Floods, Water Framework and Habitats directives and associated relevant national guidelines, should also be taken into account in preparing these LAPs.</p> <p>19. The National Planning Framework and the Regional Spatial and Economic Strategies, once finalised and adopted, should be integrated as appropriate into the Plan and LAPs.</p> <p>20. Clarification should be provided on how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, have been assessed and documented. In particular, the Plan should assess the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects, including those of a transboundary nature. How the full range of potential effects will be monitored and mitigated for over the lifetime of the Plan should also be clarified.</p> <p>21. It should be ensured that a requirement is included to carry out Appropriate Assessment in relation to plans / programmes / projects where development proposals may impact on Natura 2000 sites.</p> <p>22. The reference to the County Donegal Heritage Plan 2014-2019 in the Plan is acknowledged. The inclusion of a specific policy/objective in the Plan to protect existing ecological corridors and habitats and species, undesignated sites / areas of local biodiversity interest and to improve green infrastructure where possible should also be considered. Consideration could be given to prioritising wetland habitats, including carrying out a survey of wetland sites within the County.</p>	

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		<p>23. In respect of groundwater vulnerability and the security of source protection areas, it should be ensured that areas of groundwater vulnerability are taken into consideration during development proposals and that source protection areas are sufficiently protected.</p> <p>24. The SEA ER could clarify whether available habitat mapping (including wetlands) has informed the preparation of the SEA ER.</p> <p>25. EPA welcome the inclusion of Table 8.1 summarising the outcomes of the environmental monitoring undertaken as part of the implementation of the 2012-2018 County Donegal Development Plan. The issues highlighted by these monitoring results should be taken into account in finalising the Plan and SEA. Further detail should be provided on the monitoring proposed, including:</p> <ul style="list-style-type: none"> ▪ 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>26. 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>27. Following adoption of the Plan, an SEA Statement – “Information on the Decision” should be prepared and sent to any environmental authority consulted during the SEA process.</p>	
PB12	Department of Culture, Heritage and Gaeltacht Development Applications Unit	<ol style="list-style-type: none"> 1. The Department notes from the Council’s website that a report entitled “Appropriate Assessment Natura Impact Report of the Draft County Donegal Development Plan 2018–2024”, has also been produced. This report, however, was not forwarded to the Department. 2. If required, an appropriate assessment must be carried out by the Council before the plan is made, and no plan that would have (or perpetuate) adverse effects on the integrity of a site may be made (unless in exceptional circumstances where the provisions of Article 6(4) of the Habitats Directive may be invoked). 3. In addition to being the competent authority for the appropriate assessment of the plan, the Council should be mindful of its duties as a public authority, under Regulation 27 of the European Communities (Birds and Natural Habitats) Regulations, 2011, to 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 these Regulations. 4. The Department notes that the term ‘Natura 2000 sites’ is used and/or defined in ways that are inconsistent with the Part XAB of the Planning and Development Act, 2000 as amended (and also with the 2011 Regulations). The Department recommends that terminology be used in a manner that is consistent with the relevant legislation, and corrected or amended where necessary throughout the final plan and environmental assessment documentation. 5. An appropriate assessment has yet to be carried out and this must occur before the plan is made. No 	<p>1 to 6. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p> <p>7. Refer to themed response on flood risk contained in section 3.4 of this report.</p> <p>8 to 12. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report and also to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11.</p> <p>13. Refer to themed response on tourism contained in section 3.8 of this report.</p> <p>14. Noted.</p> <p>15 to 20. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p> <p>21. Noted.</p>

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		<p>land use plan may be made if it would adversely affect the integrity of a European site.</p> <ol style="list-style-type: none"> <li data-bbox="472 252 1603 336">6. The Department notes text in the plan documentation including but not limited to Part A (Appendix 1) and the Environmental Report which suggests that the terms 'NIR' and 'appropriate assessment' are synonymous. <li data-bbox="472 336 1603 480">7. The Dept. notes that the Council 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. In the event that new advice and recommendations come from the OPW particularly with regard to the CFRAMS Plans, or from other flood risk working groups, this should be taken into account. <li data-bbox="472 480 1603 711">8. The Dept. notes that there are references to the need to comply with the Habitats Directive in some objectives, and not in others, and consider that this could be taken to mean that such matters will arise in the case of the former and not in the latter. It is recommended that, if future compliance of plans and projects (with the Directive) is used as a mitigation measure, then there should be clearer and more consistent wording, cross-referencing or use of footnotes in each of the relevant objectives. The above type of mitigation should also be reviewed or expanded, where necessary, to cover the full range of considerations that may apply; e.g. reference to the Birds Directive, the EIA Directive, the SEA directive and relevant national legislation. <li data-bbox="472 711 1603 855">9. Within the objectives and policies included in Chapters 1 and 2 there are numerous mentions of "relevant environmental designations" and other examples throughout the plan of the use of certain terms that refer or could refer to natural heritage where the definition is unclear (e.g. "natural habitats" in Chapter 8, Section 8.1 Aim). Clarity is required as to what is actually meant by each of these phrases and consistency of use should be applied. <li data-bbox="472 855 1603 1031">10. No direct reference to the appropriate assessment process was noted within the main body of the plan. This should be reviewed and improved so that there is clarity and transparency regarding the mitigation that is deemed necessary, and so that the plan, its policies and objectives can be found to pass the tests of Article 6 of the Habitats Directive. The first reference was noted in Part A Appendix 1. In Section 1.3 of this Appendix it would be useful to include a full reference to the relevant legislation under which this assessment process is carried out. <li data-bbox="472 1031 1603 1118">11. Natural Heritage - The overall plan would benefit from review and technical input in relation to European sites, NHAs and appropriate assessment matters and terminology, particularly, but not exclusively, in Chapter 7, Section 7.1. <li data-bbox="472 1118 1603 1206">12. The Marine Resource and Coastal Management - Chapter 10 would benefit from review and technical input in relation to marine and coastal natural heritage issues. At present marine natural heritage is not referred to in the text of this chapter. <li data-bbox="472 1206 1603 1294">13. Tourism - the Key Planning Challenges section "protecting the natural environment including Natura 2000 sites" could be expanded to include all designated sites, protected species and sites with a significant biodiversity value. <li data-bbox="472 1294 1603 1382">14. There are inconsistencies in the approach taken and references to natural heritage in part C – e.g. Chapter 12 Letterkenny, Section 12.5.1 Natural and Built Heritage, Chapter 13 Buncrana Section 13.5.1 Chapter 14 Bundoran Section 15.5.1 <li data-bbox="472 1382 1603 1412">15. Four "Biodiversity, Fauna and Flora" Strategic Environmental Objectives have been identified and 	<p>22. Noted.</p> <p>23. Noted.</p>

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		<p>developed within the SEA Environmental Report (SEO BIO1-4). Whilst these objectives are welcomed it would be useful if they were expanded and/or clarified.</p> <p>16. The wording of SEO BIO1 is somewhat confusing with regard to the inclusion of Freshwater Pearl Mussel catchment areas in an objective that refers primarily to "Natura 2000 Sites". The indicator and target for this Objective refers to "the 15km buffer"- it is more appropriate to identify a considered zone of influence for each development on each European site at the time of development. (see pg. 13 of the NIR)</p> <p>17. Refer to "European site" and "Natura 2000 network" but not "Natura 2000 site".</p> <p>18. SEO BIO2 could be usefully expanded to include habitats and species protected by the Wildlife Act (as amended) including Natural Heritage Areas. At present it is unclear what "these areas" refers to. It would also be useful to take account of proposed NHAs and those habitats and species of significance at a County level. SEO BIO3 could also usefully refer to protected habitats and species. SEO BIO4 could be expanded to demonstrate compliance with Article 10 of the Habitats Directive.</p> <p>19. The written statement of the NIR contains objectives for development within European sites or which are unlikely to be able to avoid such sites, or where the location is not currently known.</p> <p>20. The NIR identifies a number of objectives where likely significant effects on European sites are not excluded. Plan-level mitigation must be demonstrated to be effective in addressing and ameliorating the full range of any adverse effects on the conservation objectives and integrity of European sites.</p> <p>21. Account will have to be taken of any significant effects on European sites arising from proposed amendments or material alterations in due course.</p> <p>22. The scale of mapping of designated sites could be improved for ease of use.</p> <p>23. The documentation as a whole would benefit from a glossary of terms.</p>	
PB13	An Taisce	<p>1. Sustainable Land Use and Transportation - the CDP must take the lead in ensuring that the planning, development, and design of Donegal's towns and settlements encourages a shift from dispersed, car-orientated settlement patterns to walkable, cycleable, and transit-orientated development patterns.</p> <p>2. Land Use and Settlement Patterns - An Taisce recognise that Donegal is largely a rural county, however it is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. An Taisce support, inter alia, Core Strategy Objective 12, "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" and corresponding Core Strategy policy, "to guide development of towns in a sequential manner, outwards from the core area in order to maximise the utility of existing and future infrastructure provision, promote the achievement of sustainability, avoid 'leap-frogging' to more remote areas and to make better use of under-utilised land." Similarly, An Taisce support the CDP's policies, such as UB-P-6, regarding the reuse and revitalisation of vacant or derelict sites for retail and residential purposes, particularly in town centre areas.</p> <p>3. The PA must address the prevalence of one-off and dispersed housing in Donegal. The CDP has a key role to play in providing suitable housing choices and alternatives to one-off housing; it should be a specific objective of the CDP to deliver suitable locations for serviced sites. Development should also</p>	<p>1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p> <p>2. Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p> <p>3 to 4. Refer to themed response on rural housing contained in section 3.5 of this report.</p> <p>5 to 7. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p> <p>8. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p> <p>9. Refer to themed response on renewable energy contained in section 3.7 of this</p>

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		<p>be consolidated in and around already serviced areas providing access to shops, schools, workplaces, etc.</p> <ol style="list-style-type: none"> 4. The recommendations of the EPA report <i>Sustainable Rural Development: Managing Housing in the Countryside 2010</i> (starting on page 272) should be incorporated directly into the CDP. 5. The PA must maintain and improve investment in public transport, walking, and cycling in order to offer communities viable alternatives to private cars. This is reflected in the Core Strategy (CS-O-13) but absent from the stated transportation aims (Section 5.1). The need to shift towards more sustainable and passive transport options should be incorporated in this section. Moreover, the CDP must detail specific policies and objectives to address these issues, an area in which the draft CDP is currently deficient. To incorporate such policies, the PA should have regard to 'Smarter Travel – A Sustainable Transport Future'. Circular PSSP-4-2010 to all planning authorities determined that Smarter Travel relates to proper planning and sustainable development under Section 9(6) of the Planning & Development Act (PDA) 2000 and must therefore be incorporated into the specific policies and objectives of the CDP. A local transport plan should be prepared and Mobility Management Plans must be made mandatory through the development management process for planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal. 6. Advancing walking and cycling as alternatives to private car use will align with Smarter Travel policy and prove crucial to the sustainable development of Donegal. 7. An Taisce submit that Transportation Policy 4 (T-P-4) on access to national roads should be amended to designate all roads in the Strategic Road Network (map 5.1.2) as "roads treated to national roads standards." This designation previously applied in the 2012-2018 CDP but was removed in Variation 1 (July 2013). The PA should have regard to Section 4.4 of the Rural Housing Guidelines 2005 on the protection of non-national roads in relation to this issue: "Planning authorities should consider in their development plans, the need to indicate any regional or county road type routes that act as particularly important transport links as well as locally specific development control requirements that will operate to safeguard the specific functions of such routes in terms of future road design and construction requirements." 8. A primary objective of the CDP must be to mitigate Donegal's contribution to climate change by reducing greenhouse gas (GHG) emissions, breaking the county's dependence on fossil fuels, and adapting the area's natural and built systems to have the resilience to thrive in a time of energy and climate uncertainty. An Taisce submit that the draft CDP is wholly deficient in objectives and policies addressing climate change mitigation and adaptation. Although climate change is mentioned occasionally in relation to, for example, transportation and flooding, it is entirely absent from the core strategy of the plan, and it is not addressed in any specific policies or objectives. This lack of mitigation and adaptation measures contravenes Section 15 of the Climate Action and Low Carbon Development Act 2015. Specifically with regards to development plans, the Planning and Development Act 2010 includes a mandatory objective for development plans [Section 10(2) of the 2000 Act as amended by Section 7 of the Planning and Development (Amendment) Act 2010] in relation to energy demand and greenhouse gas emissions - the PA therefore has legal obligations in this regard. 	<p>report.</p> <ol style="list-style-type: none"> 10. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report and also to themed response on community, culture and the Gaeltacht contained in section 3.10. 11. Refer to themed response on economic development contained in section 3.2 of this report. 12 to 13. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 14. Refer to themed response on flood risk contained in section 3.4 of this report. 15. Refer to themed response on renewable energy contained in section 3.7 of this report. 16. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report. 17. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report. 18. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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		<p>9. An Taisce recommends that a strong emphasis be placed on expanded use of renewables, with particular emphasis in the CDP on new commercial, warehouse, and industrial development. It is also recommended that the PA prepare and adopt a local Climate Change Strategy in parallel with the preparation of the CDP.</p> <p>10. A 'green infrastructure' approach should be incorporated into the planning and development process in Donegal and should become the accepted way to plan and manage urban spaces, reversing the trend of societies becoming disconnected from the natural environment. The CDP should include a section entitled Green Infrastructure modelled on the content of the Fingal County Development Plan 2010 – 2016 (Chapter 3).</p> <p>11. In relation to retail development, the following comments are made:</p> <ul style="list-style-type: none"> ▪ The CDP must include policies for the prohibition of out-of-centre retail development. The PA must take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres. ▪ The PA must require the introduction of car parking charges for out-of-centre retail development and waive parking requirements and levies for parking shortfalls for retail developments in town centre locations. ▪ The CDP must include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted. ▪ The CDP should include a policy which restricts large floor-space multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-space local shops. <p>11. The CDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plan are achieved.</p> <p>12. The CDP must be fully consistent with the PA's legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).</p> <p>13. PA must implement a new very stringent compliance regime with respect to all on-site private wastewater treatment facilities. PA must deliver appropriate alternative locations for those wishing to live in self-build properties. The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off, including, for example, a serviced site policy.</p> <p>14. The CDP must de-zone or down-zone lands categorized in 'Flood Zone A' of 'Flood Zone B' applying the sequential approach. Where the zoning of recognised flood prone areas is retained a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out. The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be made mandatory for all new development proposals.</p> <p>15. With regard to wind energy (specifically the policies that were previously subject to a Ministerial direction), An Taisce submit that these policies and standards are arbitrary and should be removed from the draft.</p> <p>16. In relation to natural and built heritage, the following comments are made:</p> <ul style="list-style-type: none"> ▪ The most significant demesnes and designed landscape in the county should be identified and planning policies applied to maintain and enhance their special character and significance. ▪ The CDP should seek to designate more ACAs and Special Planning Control Schemes. 	

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
		<ul style="list-style-type: none"> ▪ S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation. ▪ The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full. <p>17. Regarding environmental issues, the following comments are made:</p> <ul style="list-style-type: none"> ▪ The CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law, particularly with regard to the Habitats Directive. ▪ The policy recommendations of the National Biodiversity Plan 2017-2021 should be fully incorporated into the CDP. ▪ The Draft CDP fails to address the implications of Brexit for the natural environment, especially with regard to the transboundary character of the Natura 2000 network. <p>18. The submission comments are specific sites in Letterkenny as follows:</p> <ul style="list-style-type: none"> ▪ An Taisce submit that Opportunity Site 1 in Letterkenny (Town Park Extension at Gortlee) should be retained wholly as green space and that no development of any kind should be permitted as it would cause habitat fragmentation and degradation. It would also constitute a loss of the recreational and biodiversity benefits the woodland provides. ▪ An Taise submits that Opportunity Site 3 in Letterkenny (Thorn Pier and Landing Stage) is extremely sensitive to development and note that any commercial/leisure activities has the potential to adversely impact the integrity of the Lough Swilly SAC and SPA. ▪ An Taisce submit that development on Opportunity Site 5 (Former Town Port) has the potential to increase traffic at the N14-N56 junction and in the absence of a TTA development on this site would be premature. ▪ An Taisce submit that Opportunity Site 16: Kiltoy, is poorly connected to surrounding residential and commercial areas and contend that commercial and employment uses should be directed to areas in closer proximity to the town centre. ▪ Zonings south of the River Swilly including Opportunity Sites 6 and 7 - An Taisce 	
PB14	Department of Housing, Planning and Local Government	<ol style="list-style-type: none"> 1. States that, subject to a number of matters, the DHPLG consider that in broad terms the Draft CDP provides a strategic framework for the proper planning and sustainable development of the area and gives spatial expression to the economic, social, cultural and environmental aims of Council. 2. DHPLG note that it is envisaged that the policy frameworks and land use zoning maps for Letterkenny, Buncrana and Bundoran will be superseded by LAPs and states that there must be a clearer set of arrangements to ensure compliance with the core strategy and that new residential development proceeds in an orderly fashion. 3. States that clearer steps are taken in dealing with the excess of lands zoned SRR and a reduction of at least 50% of the excess would be a significant step in this regard. Request therefore, that the status of these lands be reconsidered, the excess be reduced and that there is clear articulation of the LAP process and timeframe that will address this excess within the town plans of Letterkenny, Buncrana and Bundoran. The submission notes a number of policies that could result in an overly flexible approach and place the Council under pressure to facilitate haphazard development and release of additional lands. Refers specifically to UB-P-3, LK-H-P-2. 4. Submission recommends that the wording of WES-P-11(3) in relation to multiple developments and 	<ol style="list-style-type: none"> 1. Noted. 2 to 3. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 4. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 5. Refer to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report and also to themed response on renewable energy contained in section 3.7 of this report. 6. Refer to themed response on site specific zoning requests contained in section 3.12 of

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
		<p>which currently allows for 'interim treatment plants' should be revised taking account of the views of Irish Water in the context of its connections policy.</p> <ol style="list-style-type: none"> 5. In relation to Climate Change Adaptation measures, the DHPLG refer to significant developments in government policy regarding Climate Change Mitigation, including the recent publication of the National Mitigation Plan, July 2017 as well the Wind Energy Development Guidelines 2006 and the revision which its states shall incorporate the Interim Guidelines. As a result, DOHPLG recommend that there is a significant revisit of relevant policies with regard to the statutory obligations under Section 10(2)(n) of the Act and the associated obligations to maximise each Local Authority's contribution to developing renewable energy sources without the inclusion of random and poorly evidence based set back restrictions. In addition, the submission states that the Draft Plan policies and technical standards on wind energy be reviewed to comply with the requirements of the Interim Guidelines, and the SEA shall include an environmental assessment of the technical requirements relating to wind energy developments as contained in the Draft CDP. 6. In relation to AA, the NIR and compliance with Article 6 of the Habitats Directive, the submission specifies zoning objectives in Letterkenny and Bunrana and states that the sites are located within Natura 2000 sites. The submission recommends that the development zoning objectives within Natura 2000 sites should be removed and states that the sites identified in the submission are not exhaustive and therefore the Council should satisfy itself in consultation with NPWS that the Draft CDP is fully compliant with the Habitats Directive. 7. In relation to flood risk, the submission recommends: <ol style="list-style-type: none"> (i) Provision of a clearly articulated link between the CFRAM and Development Plan objectives to ensure full clarity and transparency. (ii) A comprehensive Stage 2 SFRA is required to be completed and each policy and objective assessed. (iii) The SFRA should map boundaries for Flood Zone Areas A, B and C. (iv) Any recommendations stemming from the SFRA should be integrated into the Draft Plan. (v) That the SFRA should ensure incompatible development does not occur with Flood Zones A and B and that there is a clear correlation between the SFRA, the Development Plan written statement and any zoning maps. (vi) To avoid ambiguity, the DOHPLG strongly recommends any zoning identified in Flood Zone A and B is amended to water compatible use. (vii) Other issues raised separately in OPW submission should also be addressed. 8. A number of other observations are made described as 'minor observations' as follows: <ol style="list-style-type: none"> (i) Updated Departmental titles should be reflected in the documents. (ii) The exercise in Table 2.4 'Strategic Status of Water Services' could be carried out for Layer 2B also and rural towns thereby identifying capacity of water and wastewater treatments across the entire settlement structure. (iii) Economic Development zonings in Bunrana should be reassessed in terms of scale, location, and need by providing an evidence base approach and it is recommended that the overall quantum of each development zone is provided alongside each land use zoning map. (iv) The authority should ensure the plan is consistent with the approach laid out in Circular letter 	<p>this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p> <ol style="list-style-type: none"> 7. Refer to themed response on flood risk contained in section 3.4 of this report. 8. Comments noted. In addition, refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report and also to themed response on rural housing contained in section 3.5. 9. Noted.

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		<p>PL 2/2017 on Sustainable Rural Housing Guidelines for Planning Authorities 2005- Local Needs criteria in Development Plans.</p> <p>9. States that if the PA form the opinion that it is not possible to implement certain policies and objectives contained in the Section 28 guidelines, a reasoned justification needs to be set out in the Plan.</p>	
PB15	Eirgrid	<p>1. Submission welcomes the opportunity to comment on the draft plan and requests their submission be taken into account, and describes the roles and responsibilities they have to supply safe, secure and reliable electricity.</p> <p>In 2017 EirGrid published Ireland's Grid Development Strategy- Your Grid and this supersedes Grid25, confirming a need to strengthen the grid in the north west of Ireland and west of Northern Ireland; a map accompanying the submission highlights these areas, Figure 1. Figure 2 of the submission shows the Transmission System in Northern Ireland.</p> <p>2. Request that all references to Grid25 be replaced with the most up to date strategy 2017.</p> <p>3. Support the Aim in Chapter 8.2 to facilitate appropriate energy infrastructure.</p> <p>4. Support the general objectives and policies outlined in section 8.2.2 and 8.2.3.</p> <p>5. Regarding E-P-9, EirGrid understands the principle to protect areas of scenic amenity by seeking 'to ensure, where practical, that power lines be routed underground' but notes that undergrounding can have other significant environmental effects. They state that they employ a comprehensive and multi-criteria analysis approach to choosing technology options facilitating a balanced approach based on expert judgements informed by feedback from consultation and engagement; an approach committed to by EirGrid 2017.</p> <p>6. Set out that EirGrid plans new grid infrastructure based on consideration of a wide range of issues including:</p> <ul style="list-style-type: none"> - Avoiding areas of high amenity value. - Avoiding ecologically sensitive areas - Integrating lines into the landscape to visually absorb new structures. - Minimising disturbance to existing land uses. - Minimising the number of crossings of other lines, railway lines and roads and, - Avoiding sharp changes in direction to minimise the number of towers. <p>7. State that final routes for new lines are carefully considered balance of technical, environmental and landowners considerations and as such request rewording of E-P-9 as below (deleted text strikethrough and suggested text blue: E-P-9: It is a policy of the council to seek to ensure that new transmission network infrastructure demonstrates that all practical technology options, including undergrounding have been considered having regard for the environment where practical, power lines be routed underground, having particular regard to the scenic amenity of the receiving landscape.</p> <p>8. Also request the following new policy be inserted (suggested text blue): 'Planning applications in the vicinity of existing transmission substations and other transmission grid infrastructure must demonstrate that they are not in conflict with any further development of such infrastructure in the interests of ensuring the consistent and reliable transmission of electricity on Ireland's high-voltage grid'.</p>	<p>1 to 8. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p>

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
PB16	Causeway Coast and Glens Borough Council	<p>State that such 'Demonstration' would best occur through consultation and engagement with the asset owner (ESBN) and operator (EirGrid) to confirm potential future requirements.</p> <ol style="list-style-type: none"> 1. Causeway Coast and Glens Borough (CC&G) Council state that it generally agrees with the content of the Draft CDP, Environmental Report and NIR. 2. In relation to Part A and B, the submission notes the references to Northern Ireland and the Causeway Coast and Glens area particularly in relation to transportation policies (Greencastle to Magilligan Ferry; Water and Environmental Services (WFD and River Basin Management Plan)), the natural and built heritage policies, the natural resource development policies (and references to views across to Donegal from CC& G Borough), tourism policies (WAW cross border linkage) and the marine resource and coastal management (Greencastle to Magilligan Ferry). 3. In relation to the Environmental Report, the submission notes the tables in relation to protected ecological sites in Northern Ireland, scoping of SEA topics, summary of main environmental pressures, environmental protection objectives and incorporating environmental issues into the Plan. 4. In relation to the NIR, highlights two additional documents of relevance, namely the UK Marine Policy Statement and the Northern Ireland Marine Plan (once published). The submission welcomes the NIR conclusion of no significant effects and no requirement to proceed to stage 3 of the AA process. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. Noted. 4. Noted.
PB17	ESB Business Service Centre	<ol style="list-style-type: none"> 1. ESB states that it broadly supports the overall vision of the Draft CDP. Notes however a number of strategic issues that should be considered particularly around restrictive policies in relation to renewable energy that could limit capacity to deliver on renewable targets and which do not reflect the national Policy Position on Climate Action and Low carbon Development (2014) and the Climate Action and Low Carbon Development Act 2015. 2. The submission outlines elements of the company's responsibilities including construction and maintenance (with NIE) of all electricity infrastructure; role in relation to its ESB telecoms and telecommunication infrastructure with particular reference to co-location strategy and the SIRO project and; provision of EV charging infrastructure in Ireland and roll out to date. 3. The submission outlines planning policy in relation to green infrastructure strategy at an EU and National level and outline that some of the energy objectives and policies set out under section 8.2.2 and 8.2.3 of the Draft CDP are inconsistent with National and Regional Policy. Also states that some of the energy objectives and policies contained in the Draft CDP are at variance with the Draft CDP in relation to 'Natural Resource Development.' 4. State that to meet Government targets, ESB will connect more than 5000MW of renewable generation projects, manage more than 2,500MW of distribution connected generation by 2027 and facilitate the delivery of Ocean and Tidal energy projects. State that this is consistent with Objective E-O-1, E-P-2 and E-P-5 of the Draft Plan. 5. State that provisions must be made to accommodate the ongoing performance enhancement, redevelopment and strengthening of existing utilities infrastructure at their current locations. 6. State that the plan should maintain policies to protect future capacity for the development of energy infrastructure whilst encouraging the sustainable development of renewable energy. 7. Submission states that over restrictive policies should not prevent consideration of all options with a 	<ol style="list-style-type: none"> 1 to 12. Refer to themed response on renewable energy contained in section 3.7 of this report. 13. Noted. 14. Refer to themed response on Infrastructure contained in section 3.3 of this report. 15. Refer to themed response on flood risk contained in section 3.4 of this report. 16 to 17. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
		<p>view to identifying the optimum solution and that as a result this is not consistent with the Government. Policy Statement of the Strategic Importance of Transmission and Other Energy Infrastructure, July 2012 that 'these investment programmes are delivered in the most cost efficient and timely way possible in the interests of all energy consumers who need investment and who also pay for it.'</p> <p>8. Refer to the set back distance set out in the Development Guidelines and Technical Standards and to the Preferred draft approach announced by DHPCLG and DCCAIE in June 2017 which provides for a set back distance for visual amenity, of 4 times the tip height between a wind turbine and the nearest point of the curtilage of any residential property subject to a mandatory set back of 500m. Submission states that development policies should be consistent with the Government guidelines and the preferred approach.</p> <p>9. Refers to policy E-P-12 and states that para 8.2.1 takes a basic approach to repowering and assumes this involves minimal redesign of the site and states that this may not reflect the majority of repowering proposals. State that wind turbine technology continues to advance and that SEAI highlight that repowering will be a key to the retention of a sustainable industry. ESB therefore highlight that repowering may involve complex redesign which may include redesign of turbine configuration, site access, internal etc.</p> <p>10. Refers to policy E-P-12(b) relating to extension of existing windfarms is a restrictive policy which outlines a preferred option in advance of the required analysis and planning process and that policies of this type are not consistent with the objectives and policies of the Government which require that, 'these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions.'</p> <p>11. State that the DHPLG Circular PL5/2017 and PL20-13 advise that local authorities should defer amending wind energy and renewable energy policies until the focussed review of the Wind Energy Development Guidelines 2006.</p> <p>12. Regarding transmission and distribution, ESB welcome E-O-2. However, state request that E-P-9 be omitted as it requires where practicable power lines be routed underground having particular regard to the scenic amenity of the receiving landscape. State that this policy is of concern as it restricts consideration of all options before details and specific circumstances are considered and may prevent implementation of the optimum solution.</p> <p>13. State that the NSS, RPG's, local development plans and Strategic Infrastructure Act provides that all standards are met including extensive statutory and non statutory consultation.</p> <p>14. Regarding telecommunications, the submission welcomes the ICT policy set out in section 5.3, particularly policy TC-P-3.</p> <p>15. Regarding flood risk, the submission supports the policies and objectives outlined in section 5.4, flooding.</p> <p>16. Outline the company's role in relation to the roll out of EV infrastructure and state that EV's have the potential to act as an enabler for large scale wind energy projects due to the storage of energy in EV batteries and that a network of electric vehicles connected to the smart grid could be coordinated to smooth out peaks and valleys in the supply from renewable sources and help ensure that supply of</p>	

Ref	Organisation/Group	Summary of points raised in (prescribed body) submission	Response and Recommendations arising
		<p>electricity matches demand.</p> <p>17. Submission recommends changes to car parking standards (that have been implemented in Cork, Waterford, Dun Laoghaire Rathdown) for developments with private car parking spaces and for publically accessible car parking so as to ensure at least one parking space be equipped with one fully functional EV charging point and; that it should be possible to expand the system in the future so that up to 10% of all spaces can be fitted with a charging point and; appropriate demarcation, signage as well as system for communicating usage.</p>	
PB18	The Office of Public Works	<ol style="list-style-type: none"> 1. OPW welcomes the reference in the Draft CDP to the Planning System and Flood Risk management Guidelines for Planning Authorities, November 2009. 2. OPW state that the draft Flood Risk Management Plans for UoM 1, 35 and 36 and associated Flood Hazard mapping do not constitute a Strategic Flood Risk Assessment (SFRA). 3. State that evidence should be provided in relation to residential zoning decisions especially where there is potential flood risk to areas identified. Gives examples at Letterkenny (OPP-P-6 to OPP-P-9, Buncrana BC-ED-P-11 and Bundoran in relation to areas within the residential phase 2. State that the justification test is the best tool to outlines the criterion met as part of the SFRA and requests the justification test report in respect of the named locations and possibly others. 4. Provides an overview of the three stage Flood Risk Assessment process including stage 1: Flood Risk identification; Stage 2: Initial Flood Risk Assessment; Stage 3: Detailed flood risk assessment. 5. State that a stage 2 Flood Risk Assessment (FRA) has not been carried out for the proposed plan. State that a stage 2 FRA is required. Note that use of the PFRA is not sufficient for a Stage 2 FRA. 6. OPW recommends a Stage 2 FRA for the Local Area Plans where zoning occurs in line with the Guidelines for historically zoned areas as well as those under consideration for future development as this will establish the three flood zones. 7. State that where there is a suspected flood risk, the appropriate level of assessment may require a Stage 3 FRA. 8. Outline the planning principles to be employed in zoning of land in relation to the sequential approach to managing flood risk, the application of the justification test and the precautionary principle. 	<ol style="list-style-type: none"> 1. Refer to themed response on flood risk contained in section 3.4 of this report.
PB19	Irish Water	<ol style="list-style-type: none"> 1. Submission outlines the objective of Irish Water to provide both drinking water and wastewater infrastructure capacity to meet the domestic requirements of the settlement and core strategies of development plans. 2. Attaches information on future Capital Investment Projects (CIP) and water and waste water status in towns in Layer 1, 2A and 2B as clarification of the information contained in table 2.4 in Part A of the Draft CDP. 	<ol style="list-style-type: none"> 1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.
PB20	Department of Education and Skills	<ol style="list-style-type: none"> 1. Submission requests that sufficient land be zoned for educational purposes at appropriate location and provides guidelines in this regard such as the need to be close to community facilities such as sports facilities, libraries. Specifically references the Technical Guidance Documents-025 and 027- Identification and Suitability Assessment of Sites for Primary and Post Primary Schools as well as Government Guidance 'Sustainable Residential development in Urban Areas, 2009. 2. Suggests that land should be zoned where provision of services and access will not hinder the development of the school within the required timeframe. 3. Suggests that where possible, land adjacent to existing schools be zoned appropriately for future 	<ol style="list-style-type: none"> 1. Refer to themed response on community, culture and the Gaeltacht contained in section 3.10 of this report.

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		<p>expansion.</p> <p>4. Sets out likely requirement for primary and post primary spaces based on population projections in table 2.5 of Part A of the Draft CDP namely Letterkenny, Bunrana, Ballybofey-Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundroan, Lifford, Bunbegs-Derrybeg, Killybegs, An Clochán Liath (Dungloe) and the remainder. States that the Department would expect that the existing primary and post primary schools would be capable of catering for projected population increase set out in table 2.5. Also states that in some instances this may require extension to existing schools and this will be kept under review.</p> <p>5. Notes that a permanent site is required in Bunrana to facilitate long term development of three schools within a campus development and therefore the Department request the zoning of a suitable site.</p> <p>6. Provides the list of schools in County Donegal that are on the programme for capital Investment published November 2015.</p> <p>7. Provides information on how the Department calculates educational requirements based on demographic projections.</p>	

2 Summary of the issues raised in the public submissions

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P01		David Davin	1. Requests that Donegal County Council provides a public graveyard in Donegal Town.	1. Comments noted. This issue however, is not within the scope of the CDP.
P02		Joseph Brennan	1. Requests amendment of wording of policy NH-P-20 to include address of Cró na mBraonain Red Grouse Sanctuary, Achla Mt, Fintown.	1. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.
P03		Thomas J. Scott	1. States that Plan is 'very lacking' in dealing with agriculture development and that it is biased towards Urban Planning	1. Refer to themed response on economic development contained in section 3.2 of this report.
P04		Not signed	1. Advising of discrepancy between online, and hardcopy, versions of Fahan map (map 15.37) as they address Golan Hill/Harbour View (i.e. part of estate included in hardcopy map is excluded in online map).	1. Comments noted. However, there does not appear to any discrepancy in the mapping for Fahan.
P05		Kevin G Doherty	1. The Draft Plan should remain as presented in relation to rural development and should not 'water down' restrictions for one-off rural housing and commercial development as this would weaken Donegal's natural heritage and tourism potential.	1. Comments noted.
P06		Ronald Ferguson	<p>1. The submission highlights broad based environmental changes taking place at both local and national level, such as 'the loss or degradation of once pristine blue flag beaches (i.e. Lisfannon)', the reduction in numbers of returning wild salmon and the destruction of fish stocks in our rivers. The submission notes that, at County level, the Draft Plan could make a positive contribution to such environmental issues by introducing changes to improve our coastal angling tourism potential, aid seafood production and encourage self sustaining diversification.</p> <p>The submission cites a number of international and national examples in relation to global environmental issues and suggests a number of ways to combat the growing problems. It specifically refers to the environmental impacts of river pollution, householder pollution, global livestock market, methane reduction in agriculture, electric vehicles, timber for power generating, EU quotas and agricultural policies, renewable energy, depleting ocean stocks, national fish industry, land-based fish farming and the marine industry.</p>	1. Comments noted – the policies and objectives in the Draft Plan have been devised to allow for the sustainable development of the County in economic, social and environmental terms and having due regard to environmental challenges at local and national level. The Draft has been subject to both Strategic Environmental Assessment and Appropriate Assessment in terms of the likely environmental effects of implementing the Plan.
P07		John Mc Cay	1. The submission is a site specific zoning request to change site from 'Amenity/Recreation' to 'Strategic Residential Reserve' on lands at Cockhill Road,	1. Refer to themed response on site specific zoning requests contained in section 3.12 of

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			Buncrana. Owner of site contends that rezoning was done without permission or knowledge and has devalued land. The site is currently used for agricultural purposes. The owner states that there is currently no public access and no existing riverside walk. Also that existing public access is concentrated on the west bank. The owner requests that the Council does not seek to extend access to the east bank by means of zoning this land as "Amenity/Recreation".	this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P08		Stephen Rossley	1. Site Specific zoning change in relation to LK-SCC-P-2 on lands from 'Community/Education' to 'Established development' on North East corner portion lands at Port Road, Letterkenny. Submission states that lands (inc other 3rd parties) are outside ownership of LYIT. No rationale presented, no negotiations or offer of purchase and zoning exceeds requirement of LYIT. The submission refers to Dept of Housing, Planning, Community and Local Government guidelines in preparation of Development Plans. Section 4.10 (Factors in determining zoning) and 4.13 (Need). The submission states that no analysis is available that considers LYIT land requirements. The current adopted plan includes property within LYIT designation and no attempt was made by LYIT to expand the campus onto these lands in the previous plan. In summary, the inclusion of the premises within Zoning LK-SCC-P-2 fails to satisfy requirements outlined in the Guidelines for Planning Authorities 2007. The submission requests the zoning of lands is amended from community/education to established development.	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P09		Tony Rodgers	1. The submission refers to inability to acquire planning permission due to over-development of holiday homes in the area. The submission also states that 'allowing local people to build in the area, increases employment etc'. The submission requests that the Plan 'contains scope for local people who are indigenous ...to be able to attain planning permission.'	1. Comments noted. The Draft Plan focuses on satisfying the opportunity for holiday homes in rural areas predominantly through the use of existing housing stock or via the refurbishment of derelict buildings. In terms of permanent housing, the rural housing policies have been drafted to cater for the housing needs of rural communities in accordance with the Government's Sustainable Rural Housing Guidelines (2005).
P10	Harley Planning Consultants Ltd	Jim Harley	1. Request for the rezoning of lands at Kiltoty, Letterkenny from 'Strategic Residential Reserve' to 'Residential Phase 1'. The Letterkenny and Environs Development Plan, 2009-2015 in which these lands were rezoned was not reviewed. Letterkenny is now encompassed within the Draft Donegal County Development Plan 2018-24 (Draft CDP).1. <ul style="list-style-type: none"> Location and background Subject lands are located 2km NE of Letterkenny Town Centre and are 	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>bounded by established Tara Court to the south and east, to the north by scattered housing, and to the west by open lands belonging to Donegal County Council (DCC). Lands were originally zoned 'Residential' in the Letterkenny Town and Environs Development Plan, 2009 but re-zoned 'Strategic Residential Reserve' in 2013 through Variation No. 2. Permission was granted by DCC in 2008 for 37 units (07/80117) but refused by ABP (ref PL66.231159) due to restricted access-way which would adversely affect residents.</p> <ul style="list-style-type: none"> • Strategic Planning Context The submission provides a narrative on the Core Strategy in the Draft CDP in general, and the approach to Letterkenny as the Layer 1 centre in that hierarchy. Thus it notes that the Draft CDP identifies a requirement of 70Ha of residential lands in Letterkenny and that there is a shortfall of 839 units. The submission goes on to provide a detailed narrative on the four broad areas proposed for residential development in the Draft CDP. • Draft Donegal Co. Development Plan 2018 Residential Zoning The submission notes that the lands zoned for residential in the Draft CDP are as per those identified in the Letterkenny and Environs Development Plan, 2009-2015 (Variation No. 2) save for DCC lands at Kilttoy, which lands are located immediately to west of the subject lands. • Zoning Request Subject lands at Kilttoy are located as close to Letterkenny Town Centre as most of lands zoned 'Residential Phase 1' in current plan. After ABP refusal, Owner of subject lands acquired dwelling in Tara Court to provide access to serve subject lands. Entrance is located close to Tara Court scheme's junction with R248 and would not impact on Tara Court residents. Also, right-turn lane already exists on the R248 Ramelton Road. Zoning of subject lands would facilitate access to serve DCC lands. Only access for DCC lands is from Kilttoy Road with steep gradient and poor sight lines. Owner of subject lands would have no objection to affording access to DCC lands adjacent. Subject lands benefit from availability of gravity connection to main sewerage. Water supply also available. Subject lands meet all criteria for Residential Phase 1. It is considered reasonable that subject site be similarly zoned as Residential Phase 1 having regard to land supply shortfall and safe access. 	
P11		Malcolm and Charmaine Bowden	<ol style="list-style-type: none"> 1. Submission notes the value of the Letterkenny Airfield, Drumgreggan, Letterkenny to the town in terms of practical, business and tourism benefits. Also notes the considerable investment and improvements made to the airfield by the current owners in recent times and that, although emphasising that they have no intention of becoming a Commercial Airport nor of competing with Carrickfin Airport, there is still a lot of 	<ol style="list-style-type: none"> 1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.

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			potential to expand the facility still further for the benefit of the town. However, also notes the current limitations of the airstrip and that this is preventing the realisation of this potential, with the loss of benefits to the local community and economy. Submission asks Donegal County Council to 'consider the Airfield as part of your infrastructure improvements'.	
P12	Harley Planning Consultants Ltd	Jim Harley	<ol style="list-style-type: none"> Submission focuses on small home-based businesses in rural areas, particularly those that are not functionally-related to the countryside, and the role they play in retaining families in their homes. Notes that the Policies on Economic Development offer little or no comfort to these 'home based enterprises' and that existing and new potential 'home based ' rural enterprises with no functional connection to the countryside will be refused planning permission without economic development policy. Suggests that this 'policy vacuum' needs to be addressed and suggest the following Policy statement for consideration: <i>'It is an objective of the Council to encourage and facilitate rural home-based employment of appropriate type, size and scale (eg circa 1-2 employees), where it can be demonstrated that the development will not have significant adverse effects on the environment, including the integrity of the Natura 2000 network, residential amenity or visual amenity'</i> 	<ol style="list-style-type: none"> Comments noted. However, Policy ED-P-13, Chapter 4 of the Draft Plan specifically makes provision for home-based businesses in rural areas.
P13	Harley Planning Consultants Ltd on behalf of James McGettigan	Jim Harley	<ol style="list-style-type: none"> Request for the rezoning of lands at Carnamuggagh Lower, Letterkenny from 'Strategic Residential Reserve' to 'Residential Phase 1' on behalf of James McGettigan. The Letterkenny and Environs Development Plan 2009-2015 which rezoned these lands was not reviewed. Letterkenny is now encompassed within the Draft Donegal County Development Plan 2018-24. Location and background Subject lands are 2km north of Letterkenny Town Centre and to the east of the N56. The site extends to 30ha with planning history under ref 05/6104 (40 units), 07/40221 (291 units) and 11/40077 (Extension of Duration of 05/6104). Strategic Planning Context The submission provides a narrative on the Core Strategy in the Draft CDP in general, and the approach to Letterkenny as the Layer 1 centre in that hierarchy. Thus notes that the Draft CDP identifies a requirement of 70Ha of residential lands in Letterkenny and that there is a shortfall of 839 units. The submission goes on to provide a detailed narrative on the four broad areas proposed for residential development in the Draft CDP. Draft Donegal Co. Development Plan 2018-2024 Residential Zoning The submission notes that the lands zoned for residential in the Draft CDP are as per those identified in the Letterkenny and Environs Development Plan, 2009-2015 (Variation No. 2) save for the zoning of DCC-owned lands at Kilttoy. 	<ol style="list-style-type: none"> Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>5. Zoning Request</p> <p>Subject lands at Carnamuggagh Lower are located as close to Letterkenny Town Centre as most of lands zoned 'Residential Phase 1' in Draft Plan. Lands are accessed from established junction with N56 which was developed in conjunction with the Thornberry housing scheme and was specifically designed to service the subject lands. This road was designed to major distributor standards (7m wide, 2 footpaths etc)</p> <p>The development of these lands provides an opportunity for a major link from the N56 to Lisenennan Road to the east and would provide alternative route and relieve traffic from town centre. Subject lands benefit from availability of gravity connection to main sewerage. With one exception (lands at Crieve) zoned lands have not delivered any residential development since Variation No. 2 due largely to absence of established road access and mains sewerage which the subject lands have in place. Given the status of Letterkenny as the Gateway Town, and at the top of the settlement hierarchy and the failure of designated lands to deliver residential development, it is considered that the future residential development should be provided through zoning of lands at Carnamuggagh Lower as Residential Phase 1.</p>	
P14		John Mc Cay Architect on behalf of Mr. Martin McKinney	<p>1. (See also PO7 above). Requests re-zoning of lands at Cockhill Road, Buncrana from 'Amenity/Recreation' to 'Residential'. under Buncrana and Environs Development Plan 2014. Rehearses much of the commentary contained in PO7 above. Also states that previous owner (father) gave consent to DCC to lay foul drainage sewer through site on the understanding that 'future development could take place on the lands subject to planning permission...'. Acknowledges Flood Risk on part of site but suggests that these areas could be used as open space.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P15	Mc Cullagh Architecture & Surveying Limited	Barry McCullagh on behalf of Denis ad Margaret Grindel	<p>1. Requests 'removing' amenity zoning from a small area on the edge of Drumboe Woods, Stranorlar as 'they are small when compared to the overall lands zoned as amenity', are 'unplanted', and are 'not part of Drumboe Wood'. Also concerned that the zoning impacts on the value of (their) property and would restrict the potential for their son to utilise lands to construct a dwelling.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P16		Thomas McMenamin	<p>1. Submission consists only of a small number of comments in the 'Subject' bar of received email to the effect that the correspondent expresses dissatisfaction with the number of mini-roundabouts in Kiltroy, Letterkenny and brands the 'cost of millions to the taxpayer' a 'scandal'.</p>	<p>1. Comments noted. These matters are considered to be outside the scope of the CDP.</p>
P17	William Donoghue & Associates Ltd, Consulting Engineers &	William Donoghue & Associates Ltd, Consulting	<p>1. Proposes the inclusion of lands at Gortnamucklagh, Glenties within the settlement boundary. The lands are 400m west of the boundary of the proposed Town Centre and directly west and adjacent to the proposed Settlement Envelope Boundary. The site currently has Planning Permission for 25 housing units and 48 bedroom nursing home (Plan Perm ref 14/51193). The site is fully serviced by Foul and Public Water Mains. The</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

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	Architectural Services	Engineers & Architectural Services on behalf of Raymond & Laurence Molloy	site will be connected to existing footpath when completed. The submission states that the site is 4.8acres, fully serviced and is a brownfield site. The development will not have adverse effect on the area and will not affect heritage assets.	
P18	G-M Design Associates	G-M Design Associates on behalf of Letterkenny Rosemount Homes Ltd.	<p>1. Submission is in relation to lands at Lios Na Greine, Lisnennan, Letterkenny.</p> <p>Background Site was 'ghost estate' from 2008 but current owner completed three partially-completed dwellings on-site. There has been strong market interest in these units and planning permission has been obtained for a further 4 units and work commenced on-site in June, 2017.</p> <p>Context The submission provides a narrative on the subject lands noting that, in the Letterkenny and Environs Development Plan, 2009-2015 the site was zoned as 'Primarily Residential', whereas in Variation No. 2 (June 2013) the site was rezoned to 'Strategic Residential Reserve'. The Draft County Donegal Development Plan 2018-2024 has identified the site as 'Strategic Residential Reserve'. The submission states that the planning history and the following Core Strategy objectives provide a basis for the subject site to be zoned as Primarily Residential.</p> <p>-UB-P-5 lands adjacent were granted an Extension of Duration in respect of planning permission for 40 units. If the subject lands remain substantially unfinished there will be no sequential development of this area.</p> <p>-UB-P-17 Subject site is classified as unfinished estate but, it is contended, the site is effectively an infill site as it is surrounded by either existing or approved housing developments.</p> <p>-LK-H-P-1 Notes contents of policy in support of subject site in that it provides that consideration will be given to development in established development areas and unfinished housing developments.</p> <p>-LK-H-P-2 Notes that policy is to examine and manage the appropriate release of Strategic Residential Reserve Lands on the basis of a clear and transparent evidence led approach.</p> <p>The submission provides a further narrative on the shortfall of zoned lands in Letterkenny as follows; -Part A of Core strategy acknowledges significant shortfall of zoned land in Letterkenny for 'Primarily Residential -Phase 1'</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

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			<p>-Finishing the development will use the roads infrastructure, comply with conditions and serve the subject site (significant financial contribution from developer)</p> <p>-Proposal will efficiently use the services infrastructure works completed (significant financial contribution should not be wasted)</p> <p>-Development Charges paid €98,858 with further contribution of €19,600 and reimbursement sought if development prevented.</p> <p>-The site is a modest infill site and is second phase of successful development (Castlebane)</p> <p>-Urgent need for new housing in Letterkenny. Site would provide much needed supply.</p> <p>-New employment opportunities being created in Letterkenny</p> <p>-Pumping station installed at Lios na Greine and may not operate efficiently if capacity at unfinished estate is not delivered.</p> <p>The submission 'strenuously' objects to zoning of subject site at Lios Na Greine as Strategic Residential Reserve. The subject site is located within an established residential area and the Draft County Donegal Development Plan acknowledges that there is significant shortfall in land zoned as Primarily Residential in Letterkenny. Also, the subject site has the key infrastructure in place finance by the financial contributions already paid to the Council in the past.</p>	
P19		Michael Ward	<ol style="list-style-type: none"> 1. Roads Urgent need to improve R250 Regional Road as it is heavily trafficked and deserves upgrading by realigning dangerous corners and resurfacing the many uneven areas. 2. Libraries Libraries can not be profitable in small rural towns. The Council should set up website for book exchange for Library members with free/reduced postage. 3. Exploitation of natural resources of wind, water, mountains, beaches, Scenery Wind Donegal has the best wind speeds in Europe for the generation of electricity from wind turbines. This gives County enviable ability to reduce CO2 emissions and reduce dependency on imported fuels. Windfarms generate jobs, provide capital for the Council, landowners and community groups. Pearl mussel basins Restricting development is not sensible for greater good. Suggests that 'development ban' on pearl mussel is 'badge of convenience to prevent the construction of windfarms'. 4. Hydro power 	<ol style="list-style-type: none"> 1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 2. Comments noted – however, these matters are considered to be outside the scope of the CDP. 3-4. Refer to themed response on renewable energy contained in section 3.7 of this report. 5. Refer to themed response on tourism contained in section 3.8 of this report. 6. Comments noted. However, the detail of such matters would be more appropriately addressed under the Regional Waste Management Plan. Thereafter, Objective

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			<p>Unlikely that further damming of rivers would be allowed for production of Hydro-Electric Power. However, there is a suitable location for Pumped Hydro system similar to Turlough Hill, Wicklow (such location is not identified in the submission).. This should be favourably considered (given) job creation possibilities.</p> <p>5. Mountains/Beaches/Scenery should be grouped and promoted as a tourist attraction.</p> <p>6. Landfill- Believes that there is a need for a large landfill site in the County. Suggests that large tracts of moorland on both sides of road between Doochary and Dungloe should be investigated for these purposes. Road Shrubbery: Council should ensure that shrubbery is cut back either by private owners or Council to avoid hazards.</p>	<p>WES-O-7 states that it is an objective of the Council "To support the implementation of the 'Connacht-Ulster Regional Waste Management Plan 2015-2021' insofar as it relates to the area of County Donegal and have regard to the plan targets and strategic objectives."</p>
P20	John Mc Cay Architect	John McCay	<p>1. Submission is as per P14 above.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P21		John Cunningham and Seamus Shovlin	<p>1. Suggests amendments to Wind Energy Map to extend area in vicinity of Shannagh Windfarm, Kilcar zoned as 'suitable for augmentation'.. The submission refers to Pre-Planning enquiry considered some two years ago regarding an extension to the subject Windfarm and states that Planning Authority advice at that time was that the proposal was 'acceptable from a visual point of view' but that zoning precluded the Authority from considering a positive decision as the land was zoned as 'not acceptable for wind energy development'.</p> <p>2. Submission also states that it is not cost effective to construct 1 additional turbine to small windfarms given economies of scale and grid connection costs. The submission states that any proposal for extension to existing windfarm of less than 5 turbines should be increased to 40% (2 extra). Draft map included showing proposed increased area for augmentation together with photomontages of 40% increase.</p>	<p>1-2. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P22	McCullagh Architecture & Sureying Ltd.	Barry McCullagh on behalf of Patrtick McDermott	<p>1. Seeks inclusion of lands at Ballaghaderg, Letterkenny within the 'Letterkenny and Environs Plan boundary' and requests if the Planning Authority would consider a land use zoning of residential or strategic residential reserve when considering the Draft Plan.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P23		Rachel Furlong	<p>1. Notes Scottish Power Renewables (SPR) as being part of the world's largest wind energy developer and operator of Barnesmore Windfarm in Donegal</p>	<p>1-8. Refer to themed response on renewable energy contained in section 3.7 of this</p>

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			<p>2. General Provides a general commentary on: (a.) its support for the principles set out in White Paper on Energy Policy: Ireland's Transition to a Low Carbon Energy Future 2015-2030, and that stable and predictable policy and regulation is vital to provide a basis for companies to invest; and (b.) the benefits of renewable energy, and particularly on-shore wind energy, including stimulation of the local and regional economy, the opportunity to progress to a low carbon economy, security of energy supply, and its commitment to a package of local community benefits. Whilst noting that 'Ireland has a pipeline of renewable energy projects that can achieve the 2020 40% renewable electricity target, SPR also emphasises the future role of repowering and life extensions and therefore welcomes the support for such projects in Policy E-P-16.</p> <p>3. Goes on to comment on the suite of objectives and policies on Wind Energy. Generally supportive of the Objectives but makes a specific suggestion in relation to Objectives E-O-6 on the grounds that: 'assessment of impact on residential amenity can be... subjective'. Proposed suggestion as follows (additional text in bold): <i>"To ensure that wind energy developments do not have an unacceptable adverse significant impact upon the existing residential amenities of residential properties, and other centres of human habitation"</i></p> <p>4. SPR supports policies E-P-1, E-P-2, E-P-5, E-P-10, E-P-14, E-P-16 Re Policy E-P-9, (seeking, where practicable, undergrounding of power lines), suggests that scenic amenity of receiving landscape should be key consideration and that, that in some circumstances, laying underground cables can have far greater impact than overhead line connection. Suggests that decisions on overhead v underground cables be done on case by case basis.</p> <p>5. Re Policy E-P-12 (in particular the part thereof noting support for augmentation, upgrade and improvements of existing windfarms), welcomes inclusion of additional land categorisation of "areas identified as Acceptable for Augmentation of Existing Windfarms" as, 'in coming years, this shall be vital to ensure levels of renewable deployment do not decline and that opportunities to maximise the benefits of existing renewable energy developments through repowering are realised.' Re Policy E-P-17 (deals with developers' responsibility for repair/maintenance of roads associated with development) agrees in principle but suggests clarification that liability should cease once roads 'have become adopted highways'.</p> <p>6. Re Policy E-P-18 (stipulates that impacts on natural, cultural and built heritage should be assessed as part of renewable energy development proposals), makes the case that the Policy as drafted is too broad brush and that it needs to be more focussed in line with the requirements of the Paras 1 and 2, Schedule 6, Planning and Development Regulations 2001. Thus, where through the scoping phase, robust evidence is presented to demonstrate that significant effect are unlikely to be manifest for certain environmental receptors, these aspects should be scoped out. Furthermore, where</p>	report.

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			<p>impacts are predicted, the Regulations stipulate that EIARs should include <i>"a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects".</i> The submission states that the proposed policy specifies that any potential impact should be assessed and predicted impact mitigated. This does not reflect the legislation and guidance. SPR note that some impacts can be acceptable/positive. Policy E-P-18 should be amended as follows <i>"It is a policy of the council that potential significant effects on natural, built and cultural heritage including effects on archaeological monuments and watercourses are assessed as part of renewable development proposals. Where significant adverse effects are predicted, mitigation measures such as buffer zones, separation distances and access arrangements should be employed as appropriate to reduce effects to an acceptable level"</i></p> <p>7. Re Policy E-P-21 (requires that, for all renewable energy projects, details of proposed grid connection and all associated infrastructure are considered in the EIS and NIS as may be required), suggests that whilst it is appropriate to include an assessment of routing study to demonstrate that an appropriate grid connection can be achieved without creating unacceptable adverse impacts, policy should be sufficiently flexible as details of exact route and infrastructure required 'may not be entirely known or within the control of the developer when the application for the generating station is prepared and submitted'.</p> <p>8. Goes on to comment on Appendix 3- Development Guidelines and Technical Standards Section 6.5(f) [stipulation re set-back distance of 10 times tip height from residential properties and other centres of human habitation] : Concerned that Plan will diverge from Wind Energy Development Guidelines (2006), preferred draft approach to revised Guidelines (Ministerial Statement of 13.06.17), and draft CDP Policy E-P-10. Advises that, 'Fundamentally, the scale of turbine blade tip height does not correlate to its level of noise emissions...' Would support a revision of the CDP 'to that proposed in the forthcoming revised guidance (as indicated in the ministerial statement) to provide a robust assessment on a case-by-case basis allowing proposals to be judged on their own merits. Section 6.5(b) [Zone of influence/flight path at Donegal Airport] Makes the case that there are technical reasons not to include this blanket provision including: (1.) that 'typically the line of sight visibility of a windfarm development from an airport would be assessed to identify potential for the turbines to interact with the operation of the radar facility; however, Donegal Airport does not have radar; (2.) re whether turbines should be considered to be an aviation obstacle; suggests that this 'should not preclude the development of a turbine, as there is scale of impact severity and the aviation stakeholders may be able to tolerate or mitigate the impacts of an aviation obstacle. Thus, such proposals should only be a basis for undertaking an impact assessment in consultation with Donegal Airport.</p>	

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P24		Vincent Breslin	<ol style="list-style-type: none"> 1. Re Transportation (Ch 5): Suggests that Council policy in relation to road construction and maintenance should incorporate a much greater emphasis on pedestrians/cycle safety. Contends that erecting signs for cycle lanes is misleading. Also states that the Council should pass bye-laws prohibiting erecting commercial signs at road junctions (50m from junctions) and commercial signs that appear similar to road signs. Suggests that the Council invest in electronic signs to promote road safety and prevent litter. 2. Re Marine Resources and Coastal Management (Chap 10), suggests that Bye-laws should be passed to protect all beach areas from jet skis. 3. Also refers to Irish Language use on road signs and suggests the following policy for the entire County: i.e. (all) signs should have 'two languages' (assumed to mean bi-lingual) with Gaelige being uppermost in the Gaeltacht and being grammatically correct. 	<ol style="list-style-type: none"> 1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 2. Comments noted – this matter is considered to be outside the scope of the CDP. 3. Comments noted – Road signage in the County will be designed pursuant to TII guidance.
P25	Harley Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.	Jim Harley	<ol style="list-style-type: none"> 1. Proposed re-zoning of 'white lands' at Cappry, Ballybofey to Residential. Location/Background States that the subject lands are within the 'settlement plan boundary area 'and (would be) an extension to established Aisling Court development. Lands are adjacent to N15 approximately 1km west of town centre. Site extends to circa 6Ha. Planning Permission was granted under 02-8429 (20 units completed), 04-9312 (21 units completed), and 0660609 granted on the subject site (48 units NOT commenced). Strategic Planning Context. Provides a narrative on the Core Strategy in the Draft CDP in general, and the approach to Ballybofey as a layer 2A town in that hierarchy in particular. Notes that the Draft CDP identifies residential lands in Ballybofey and that there is a shortfall of 344 units. Ballybofey/Stranorlar Settlement Framework Provides a narrative on Chapter 15, Part C noting that it sets out settlement frameworks for the 59 settlements of Layers 2 and 3 of the settlement structure set out in the Core Strategy. Zoning Request States that lands identified for residential zoning in the Ballybofey/Stranorlar Settlement Framework (CDP) 2012, and repeated in Ballybofey/Stranorlar Framework map in the Draft County Plan (2018-2024), have failed to deliver any residential development since adoption of the previous (2012-2018) Plan. Contends that subject lands are well served in infrastructural terms with access via Phase 1 and 2 to Aishling Court Scheme, water mains and public sewer. Also, concerned that the subject lands would not be given favourable consideration when assessed against the provisions of Policy UB-P-2 in relation to applications for residential development in Layer 2A wherein it is provided that such applications will be assessed 'in the light of inter alia residential land use 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>zonings included in Part C of Draft Development Plan'. Furthermore, for similar reasons, does 'not take comfort' from Policy UB-P-3. Despite Policy UB-P-3, considers that lands not zoned Residential will not be given favourable consideration before publication of Draft LAP. The submission states that in context of the strategic status of Ballybofey/Stranorlar, the shortfall of 344 units that the lands zoned Residential can provide, and the failure of any zoned lands to deliver any residential development during the past five years, it is considered that residential development can be provided through Residential zoning on lands at Cappry in emerging Draft Plan and LAP. The submission request that subject lands be zoned Residential.</p>	
P26		Ronald Ferguson	<ol style="list-style-type: none"> Submission is in relation to Greencastle Pier as referenced in Part B, Chapter 9, and Policies TOU-P-7. The submission is very detailed and technical in nature although linking to renewable energy and maritime safety issues also. 	<ol style="list-style-type: none"> Refer to themed response on tourism contained in section 3.8 of this report, themed response on the marine resource and coastal management contained in section 3.9 and themed response on renewable energy contained in section 3.7. In addition, this submission refers to numerous issues that are not considered to be within the scope of the CDP.
P27	Harley Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.	Jim Harley	<ol style="list-style-type: none"> Proposal for rezoning of white lands within the designated Donegal Town settlement boundary to Residential. <p>Location/Background Subject lands are within the Donegal Town settlement plan boundary area and are located approx 1km west of the Diamond along the N56. Site extends to circa 6Ha. Outline Planning Permission was granted in 2005 (49 units)], and Permission Consequent granted in 2007. An extension of duration was also granted in 2012 thereby extending the permission until June, 2017. The submission states that a 'substantial amount of preliminary ground works have commenced on-site and that an application will be submitted to complete works in the near future.</p> <p>Strategic Planning Context. Provides a narrative on the Core Strategy in the Draft CDP in general, and the approach to Donegal Town as a layer 2A town in that hierarchy in particular. Notes that the Draft CDP identifies residential lands in Donegal Town and that there is a shortfall of 170 units.</p> <p>Donegal Settlement Framework Provides a narrative on Chapter 15, Part C noting that it sets out settlement frameworks for the 59 settlements of Layers 2 and 3 of the settlement structure set out</p>	<ol style="list-style-type: none"> Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>in the Core Strategy.</p> <p>Zoning Request The submission states that lands selected in the Donegal Town Settlement Framework in 2012 and Donegal Framework map in the Draft Plan have failed to deliver any residential development since adoption of previous plan. Furthermore, no planning applications have been made on these sites. Subject lands at Doonan are located no further from town centre than 2 of the 3 zoned sites, and sequentially are well located. These lands are also served well in terms of roads, water and sewer. Work has commenced and it is submitted that completion of the site would comply with policy UB-P-17 of Draft Plan (provides that Council will consider proposals for urban residential development that seek to resolve unfinished estates).</p> <p>Also, concerned that the subject lands would not be given favourable consideration when assessed against the provisions of Policy UB-P-2 in relation to applications for residential development in Layer 2A wherein it is provided that such applications will be assessed 'in the light of inter alia residential land use zonings included in Part C of Draft Development Plan'. Furthermore, for similar reasons, does 'not take comfort' from Policy UB-P-3. Despite Policy UB-P-3, considers that lands not zoned Residential will not be given favourable consideration before publication of Draft LAP. The submission states that in context of the strategic status of Donegal town, the shortfall of 170 units that the lands zoned Residential can provide, and the failure of any zoned lands to deliver any residential development during the past five years, it is considered that residential development can be provided through Residential zoning on these lands in emerging Draft Plan and LAP. The submission request that subject lands be zoned Residential.</p>	
P28		Peter Mullan	<p>1. Supports the proposed County Development Plan and in particular the undernoted sub-sections of Section '10.6.5'</p> <p>Wind Turbines must meet the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines and in addition must not be located within:</p> <p>1 a, The zone of visual influence (ZVI) of the Glenveagh National Park 2 b, The zone of influence/flight path at Donegal Airport. 3 c, The 6 Fresh Water Pearl Mussel (SI 296 of 2009) catchments contained in the Freshwater Pearl Mussel Sub-Basin Management Plans for Clady, Eske, Glaskeelin, Leannan, Owencarrow and Owenea. 4 d, A set back distance of ten times the tip height of proposed turbines from residential properties and other centres of human habitation.</p>	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P29		Morgan McCandless	<p>1. Lands at Malin Road, Carndonagh The submission states that they, as a representative of the Registered Titleholder, are intending to seek planning permission for suitable development of the land in the future.</p> <p>The land as identified (c4.15acres) has adequate sight lines for multi density and mixed-use development, uninterrupted frontage on road R238, ready access to services (sewerage/water/electricity etc), served by public footpath, not subject to environmental or landscape designations and is in close proximity to Carndonagh town centre (Tier 2A)</p> <p>The submission states that the site presently sits immediately outside Settlement Area as designated in the Draft Plan and it is intended to make submission to have this reconsidered when draft Carndonagh LAP is published.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P30		Sean O'Donnell	<p>1. Invasive Plant Species The submission proposes that an objective of eradication of invasive plant species is included into the Plan. The submission provides a narrative on the problems arising from invasive species and that a systematic programme drawn from international best practice be drawn up. The programme should include best methods of treatment, most effective herbicide and effective time of year to treat and identifies a list of 'DONT'S' that contribute to spread of the plants as follows; (Do not strim, do not disturb the soil for 7m around the plant, do not attempt to dig the root, do not cut back and leave cuttings, do not compost cuttings, do not ignore it)</p> <p>2. The submission also states that farmers should be made aware of their obligations under regulation 49-50 of the European Communities (Bird and Natural Habitats) Regulations 2011. Also proposes that the presence or proximity of Japanese Knotweed should be a material consideration in the assessment of planning applications.</p> <p>3. The submission also states that training should be provided for front line staff.</p>	<p>1. Comments noted. Policy NH-P-2 of the Draft Plan states that 'It is the policy of the Council to protect the habitats of species listed for protection through the prevention and management of the spread of invasive plant and animal species in the County in accordance with European and National legislation.' Furthermore, the Council is currently undertaking a 4 year Invasive Alien Plant Species (Knotweed) Treatment Programme on public roads around the county. Precise detail in relation to method of treatment etc. are outside the scope of the CDP.</p> <p>2. Comments noted. The requirement for farmers to be aware of their obligations under Bird & Natural Habitat Regulations is outside the scope of the CDP. The Council would have regard to the presence of Japanese Knotweed in assessing a planning application.</p> <p>3. Noted – this matter is outside the scope of the CDP.</p>
P31		Mark Gallagher	Submission is in relation to 30acres of land at Creevesmith, Letterkenny. States that planning permission exists for 174 houses under ref 06/80149 but expires in December 2017 after which	Refer to themed response on site specific zoning requests contained in section 3.12 of

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			(they believe) the site will be 'relegated' to 'Residential Reserve'. The submission states that the land is in strategic position, is within walking distance of the town, and there are already existing services in the area with plans for completion of adjacent development.	this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P32		Mervyn and Joyce Norris	<p>Supports the proposed County Development Plan and in particular the undernoted sub-sections of Section '10.6.5'</p> <p>Wind Turbines must meet the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines and in addition must not be located within:</p> <p>1 a, The zone of visual influence (ZVI) of the Glenveagh National Park</p> <p>2 b, The zone of influence/flight path at Donegal Airport.</p> <p>3 c, The 6 Fresh Water Pearl Mussel (SI 296 of 2009) catchments contained in the Freshwater Pearl Mussel Sub-Basin Management Plans for Clady, Eske, Glaskeelin, Leannan, Owencarrow and Owenea.</p> <p>4 d, A set back distance of ten times the tip height of proposed turbines from residential properties and other centres of human habitation.</p>	Refer to themed response on Renewable Energy contained in section 3.7 of this report.
P33		Bettina Bartmann	<p>Submission is extensive and submitted in an unusual format, including the extensive use of emojis. Generally supportive of Draft Plan.</p> <p>Provides opinion/comment on specific policies/issues as follows;</p> <p>Generally supportive of the detailed contents of the various sections of the Plan dealing with Wind Energy. States that people of Mossy Glen regret that 10 x tip height wasn't already enacted in 2012 and would have protected the area from two wind turbines built at Crockbrack Hill which visually detracts from the 'WAW' at this location.</p> <p>Chapter 3: Town and Villages Generally supportive and also states that it is good to see that the Inishowen peninsula itself is 'THE asset'</p> <p>Chapter 4: Economic Development Generally supportive but subject to proviso that supports renewable energy enterprises 'only if...are not wind farms.'</p> <p>Chapter 6: Housing Generally supportive, particularly the Objective HS-O-1 (encourages the use of existing material assets such as vacant properties in towns and villages) but asks the question why half-finished'</p>	<p>Refer to themed response on Renewable Energy contained in section 3.7 of this report.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Refer to themed response on core</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>holiday homes that are ruins cannot just be demolished and why derelict holiday homes unused cannot just be foreclosed or forcibly used?</p> <p>Chapter 5: Infrastructure Emphasises importance of Greencastle to Magilligan ferry service. Supports objectives of Plan to minimise (air and) noise pollution. The submission also refers to lack of Broadband in the locality.</p> <p>Chapter 8 Natural Resource Development Generally supportive and particularly supports the (restrictive) policy approach to fracking (Policy E-P-8). The submission also requests that the word 'significantly' be deleted from MRCM-P-9 (deals with impact of development on coastal areas), and similarly that the word 'adversely' be deleted from Policy MRCM-P-10 (deals with the impact of development proposals on amenity assets of the County).</p> <p>Chapter 9 Tourism: Requests that Inishowen is declared as 'Protected Landscape' and supports Policy TOU-O objectives 1-7 and the prioritisation of local business and tourist initiatives.</p>	<p>strategy and housing contained in section 3.1 of this report.</p> <p>Noted. Support for the Greencastle-Magilligan ferry service is provided at Policy T-P-21; and support for comprehensive broadband coverage provided at Section 5.3: 'Telecommunications'.</p> <p>Noted.</p> <p>Noted. However, it is considered that the policies as currently drafted provide the appropriate balance to consider the merits of development and the need to protect our natural resources.</p> <p>Broad support for Tourism chapter Noted. The suggestion that local businesses and tourist initiatives are prioritised is noted and it is considered that the policy framework as drafted provides an appropriate framework to consider such proposals, subject to other objectives and policies of the Plan. The identification of the entirety of Inishowen as a protected landscape is considered to be unrealistic.</p>
P34		William Doherty	<p>Proposal for re-zoning of 2.287 hectares of land at Clonbeg, Tullyarvan, Buncrana, from 'Strategic Residential Reserve' to 'Residential Phase 1'. Notes that this would be a third phase with the first two already successfully completed.</p> <p>The submission consists of three documents. The header on the first submission (hereafter referred to as the 'primary submission') refers specifically to the subject consultation exercise. The second submission is identical to the first in content but is dated 9th August, 2016 and the header refers to the CDP 2012-2018. The third is a longer submission than the other two, is</p>	<p>Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>dated 14th October, 2013, and the header refers to the Draft Buncrana and Environs Development Plan 2014-2020. The 'primary submission' clarifies that the developer seeks to rely on all three submissions.</p> <p>States that the site had permission for 34 units but the permission expired in July, 2016. Notes previous proposals to 'de-zone' the land from residential to strategic residential reserve in the Buncrana and Environs Development Plan 2014-2020 and previous submissions made in opposition to this.</p> <p>Refers to the Minister for Housing, Planning Community and Local Government's 'Rebuilding Ireland-Action Plan for Housing and Homelessness' and circular PL 8/2016 and APH 2/2016 and of the requirement of local authorities to have regard, inter alia, to practical problems associated with the availability of land. Suggests that there are problems with many of the 31 sites zoned as Residential Phase 1 in the Buncrana & Environs Plan, particularly in terms of the apparent (un)willingness of owners to develop them. Notes that the Minister is now requesting local authorities to immediately consider how mechanisms within the planning process might best be utilised to bring forward appropriately-located new housing supply at affordable prices. The submission further states that the new Cockhill Bridge under construction will improve the accessibility of the site. Also notes that the site constitutes an unfinished development, represent the third of 3 planned phases for the site and that the decision to de-zone was made without due consideration of the practical advantages of the site and 'the unique readiness of this development'. Infrastructurally, the site is 'at an advanced stage' and unlike many of the other sites that were re-zoned, the lands adjoin and existing established community. Finally, it is noted that the owners are 'desirous to act'.</p>	
P35		Noreen Donaghy	Request for lands (currently located to the east of, and just outside of, the Settlement Framework boundary) 'to be included in the new development plan'. In support of the proposal, notes that the lands were previously included in the town boundary in the County Development Plan, 2000-2006 and are also 'within the town speed limit'.	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P36	Keep Ireland Open	Roger Garland	<ol style="list-style-type: none"> The submission sets out a detailed analysis of the structure, format and content of the Draft CDP stating that its scope is limited to access to the countryside and directly related issues. It provides extensive proposed additional text, amendment of text and proposed deletion of text through the various chapters of the Plan. It is split into three sections namely 'legislative content'; 'access and directly related issues and walking and cycling' and; 'protection of our natural and archaeological heritage and landscape and other matters not included in B'. In relation to legislative content, the submission includes the following comments: <ul style="list-style-type: none"> The draft plan fails to comply with, have regard to or take into account the Planning & Development acts, the NSS, plans in adjoining counties, Border Regional Planning 	<p>Submission, and in particular its comprehensiveness, is noted and acknowledged as being a major contribution to the process.</p> <p>In relation to Point 2, the Core Strategy section was developed in a robust manner in the context of both the North-West City Region initiative and the Border Regional Planning Guidelines. The Heritage of the</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>Guidelines, Heritage Act 1995 and the National Heritage Plan.</p> <ul style="list-style-type: none"> ▪ Makes suggestions for omission, amendment and inclusion of text regarding compliance and consistency with legislation, plans and programmes. <p>3. In relation to 'access and directly related issues and walking and cycling' the submission suggests structural and format changes across a number of chapters of the plan and suggests opportunities to integrate the importance of walking and access to the countryside across a wide variety of areas including proposed new agriculture and forestry sections; the promotion and development of walking and cycling strategies including in the areas of greenways, former railway lines, physical activity and health, recreation, facilities ancillary to walking and cycling tourism, walking trails and protection of scenic quality of walking routes; development of green infrastructure; promotion of public access to natural heritage and amenities including the islands, graveyards and archaeological features; the need to identify, protect and support rights of way within the consideration of proposals for natural resource development; tourism potential and the need to protect natural heritage and promote public access; opportunities for coastal paths; improvement to the list of public rights of way contained in Appendix 3, Development Guidelines and Technical Standards.</p> <p>4. In relation to protection of our natural and archaeological heritage and landscape, the submission suggests further structural and format changes across a number of chapters of the plan and suggests opportunities including to integrate the importance of walking, cycling, recreation, green infrastructure, rural tourism, eco-tourism, agri-tourism and woodland areas; visual impact of development on amenity value; protection of views and prospects; protection of archaeological resources; development of networks of open space; integration of landscape character assessment; protection of designated conservation sites; potential and protection of inland waterways; the protection of Glenveagh National Park; the designation of the Blue Stack Mountains as a National Park or Special Amenity Area and the potential development of Geo- Parks.</p>	<p>County is also dealt with in a comprehensive manner in the document in the context of a strong appreciation of the importance of this resource not just to the County but to a much wider constituency also.</p> <p>Noted. The Development Plan is a strategic planning document that provides a broad policy framework to guide future development in the County and must be prepared in compliance with numerous statutory requirements. The level of detail requested in relation to this particular topic is challenging. However, I am satisfied that the broad subject area of active and sustainable tourism and leisure is given appropriate and proportionate coverage in the Draft Plan including at Chapter 5: 'Infrastructure' (eg. Objective T-O-13 and Policies TOU-P-30, 31, 32, 33, 34 and 35 and Chapter 9: 'Tourism' (eg. Objective TOU-9; Policies TOU-P-9 and TOU-P-10).</p> <p>Noted. See responses above.</p>
P37		Patrick and Tracey Gallagher	<p>1. This submission refers to lands in the townland of Attatante (Derrybeg) and states that part of the lands in question have been zoned as 'Not Acceptable' for wind energy development in the Draft CDP.</p> <ul style="list-style-type: none"> • The submission requests that all of the lands (as identified on map...) be zoned as 'Open to Consideration' for wind energy and notes that the lands are adjacent to an existing wind farm and in an area of high unemployment. It is contended that wind energy may offer opportunities for future generations and the submission notes that the subject land is unsuitable for anything but grazing or wind farm development. 	<p>Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P38	Harley Planning Consultants Ltd	Jim Harley	<p>1. This submission states that nearly all references to the importance of 'brownfield' development have been removed from the Draft CDP 2018-2024 and suggests that Donegal is only county ignoring the benefit of such development.</p>	<p>Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>2. The submission notes that the current CDP includes a specific policy (Policy RH-P-10) that allows for holiday home development on brownfield sites in certain circumstances; however, the Draft CDP has no such policy provision. In order to address this issue, it is suggested that the Planning Authority re-introduce the 'brownfield element' that currently exists in policy RH-P-10 as an additional urban holiday home policy (suggested ref. UB-P-29) in the new County Development Plan, as follows -</p> <p><i>"It is a policy of the Council that holiday home development will be considered within the settlement framework areas without the application of a restriction in terms of the balance between holiday homes and permanent homes (policy UB-P-24), subject to environmental and heritage designations and amenity considerations and where the applicant can demonstrate that the site is a brownfield site within the urban fabric of a settlement framework and its development for holiday home purposes is of a size and scale that would not be detrimental to the character of the settlement. A brownfield site is one that has been previously built upon. It excludes parks, recreation grounds, private or public open space, allotments, forestry lands/buildings agricultural lands and land where the remains of the previous use have blended into the landscape, or have been overtaken by landuse zonings or lands of conservation value or amenity use".</i></p>	
P39	Harley Planning Consultants Ltd	Jim Harley	<p>1. This submission has been made on behalf of GDC Ireland Ltd in relation to lands at Carndonagh. The submission states that the Draft CDP zones 11.5Ha of land for 'Residential Phase 1' in Carndonagh but acknowledges that this would nonetheless result in a shortfall of 114 housing units. The submission requests the rezoning of certain parcels of land and contends that the suggested rezoning would help make up for any shortfall in lands required for residential purposes.</p> <ul style="list-style-type: none"> • Site Area no. 1 This site is located on Pound Street/Old Moville Road and extends to 1.12Ha. The lands are bounded to the west by lands zoned for residential purposes in the CDP 2012-2018 and to the east by the Inishowne Co-Op premises. It is contended that the development of these lands would constitute reasonable 'in-fill' development. • Site Area no. 2 This site is located north of Costcutter supermarket and extends to 2.08Ha The site is 360m from the Diamond area with previous planning history (now expired) of 46units under ref 00/5464. The submission states that GDC owns the lands adjacent to the existing access road, which would enable road widening if required. GDC also own lands adjacent the river and could therefore provide a pedestrian access bridge over Donagh River, allowing direct access to the town centre. The submission contends that these lands could provide residential development potential close to the town centre but notes that it will be necessary to extend the 	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>town boundary to include these lands.</p> <ul style="list-style-type: none"> • Site Area no. 3 This site is located at Barrack Hill and extends to 0.46Ha. The site is bounded to the East and South by DCC lands which are zoned residential in the CDP 2012-2018. The submission contends that the subject lands are closer to the town centre than the adjoining DCC lands which are currently zoned residential. • Site Area no. 4 This site is located west of the Derry Road adjacent to Cill Bhríde and Ard Bhríde DCC housing schemes and extends to 2.599Ha. The site currently has the benefit of planning permission for 66 units under ref 12/50815 (expires 09/06/18). The submission states that these lands are located adjacent to established residential development and close to the girls' Primary School. • Site Area no. 5 This site is located along the new Merville Road between the new by-pass road and the Glengannon River. The lands are currently outside the designated town boundary. The submission requests that the lands be included within the development boundary due to their strategic location on the eastern approach to the town. Residential zoning is not requested; inclusion within the town boundary would be considered sufficient. <p>2. In addition to the foregoing 'rezoning' requests, the submission also suggests that lands to the immediate south of the girls' Primary School be rezoned from 'residential' to educational to facilitate the potential future expansion of the school.</p>	
P40	Harley Planning Consultants Ltc	Jim Harley	<p>1. This submission relates to lands at Navenny, Ballybofey/Stranorlar and requests the 'rezoning' of the subject lands for residential purposes.</p> <ul style="list-style-type: none"> • Location/Background The subject lands are within the current settlement envelope of Ballybofey/Stranorlar and extend to 1.2Ha. The submission states that planning permission was granted on these lands in 2006 under ref. 05/60048 (34 units); development was subsequently commenced but never completed (this permission expired in October 2011). The submission also states that planning permission was subsequently granted by DCC for demolition of partly constructed dwellings on site and for the construction of 9 No. new dwellings (ref. 14/51060); however, this 	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>decision was overturned on appeal to ABP.</p> <ul style="list-style-type: none"> • Strategic Planning Context. The submission provides a narrative on the Core Strategy in the Draft County Development Plan (CDP) in general, and the approach to Ballybofey/Stranorlar as a 'layer 2A town' in that hierarchy. It states that the Draft CDP identifies a shortfall of 344 housing units in the settlement. • With regard to services, the submission states that there is sufficient capacity in terms of water supply for the settlement and that wastewater treatment capacity will be resolved through the action under the Irish Water investment programme 2017-2021. • The submission provides a narrative in relation to the Ballybofey/Stranorlar Settlement Framework and states that Ch 15 of Part C of Draft County Development Plan sets out settlement frameworks for 59 Settlements in Layers 2 and 3. The submission states that there is no specific written statement for these settlements but it is noted that the Draft Plan does identify settlement maps for Ballybofey/Stranorlar. It is contended that the lands currently zoned for residential purposes in the Ballybofey/Stranorlar Settlement Framework have failed to deliver any residential development. • It is contended that the subject lands at Navenny are well served in terms of roads, water and sewer. The submission states that the owner of the subject lands is concerned that under Policy UB-P-2 of the Draft Plan, the subject lands would not be given consideration for residential development as they are not 'zoned' for such purpose. The owner takes no comfort from policy UB-P-3, which may allow for residential development on 'unzoned' lands subject to a number of criteria – in effect, the owner of the lands is of the opinion that, in the absence of a residential zoning, residential development is unlikely to be permitted on the lands in question prior to the adoption of a Local Area Plan for the twin towns. The landowner is also concerned that lands zoned 'residential' in the CDP will be given preferable treatment when it comes to zoning at the LAP level. • Taken in the context of the 'shortfall' of 344 housing units and the consideration that current residential zonings have failed to deliver, the submission contends that the subject lands at Navenny should be zoned for residential purposes in both the CDP 2018-2024 and the emerging Ballybofey/Stranorlar LAP. 	
P41		Seamus Mac Aodha	The submission raises the serious issue of the invasive shrub Rhododendron (Ponticum) and states that Donegal is especially affected given its acidic soil and bog areas. The submission requests that the Council raise this issue with other relevant Statutory agencies and include a policy on this matter in the County Development Plan to halt the further spread of Rhododendron and ultimately eradicate the species.	Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P42	The Residents of Grianan Park, Burnfoot	Simon Doran	<p>The submission relates primarily to</p> <ol style="list-style-type: none"> 1. The serious deficiencies in sewerage infrastructure serving residential developments in Burnfoot (Grianan Park, Monreagh Park, Pairc an Ghrianain) and Bridgend (Aileach Valley, Stoneybridge and Carraig Bridge). 2. The status of Bridgend, being downgraded from a Tier 2 town in the current CDP to a Layer 2B town in the Draft County Development Plan. The submission also raises the urgent need for a robust water and wastewater service strategy for the wider Bridgend and environs area. <ul style="list-style-type: none"> • Background The submission provides an extensive narrative and 'planning history' relating to lands at Grianan park in Burnfoot and notes that there are serious deficiencies in terms of sewage infrastructure and significant difficulties in achieving a permanent solution in this regard. • Status of Bridgend under the Draft Area Plan The submission states that the current plan provides a 'development constraint' in Bridgend as the town has been relegated to 'Layer 2B' status. The submission suggests that this shift in policy is in direct response to comments from the Planning Service of Derry City and Strabane District Council which suggested that "it would be appropriate to show restraint in settlements such as Bridgend-in support of the growth of Letterkenny...". • The submission states that it is incredible that the status of Bridgend is not recognised within the proposed Development Plan given its strategic location and importance, which exceeds that of other layer 2A towns e.g. Dungloe and Killybegs. • The submission suggests a link between the de-prioritisation of Bridgend in the Draft CDP and the lack of plans for infrastructure provision in that area, and states that there is no longer a Water Service Strategy Status for the wider Birdstown Area. The submission elaborates on infrastructural provision and states that there needs to be a clear focus on the current EPA quality and capacity issues within Bridgend and its environs. The submission continues and makes the case for Bridgend having 'Layer 2A' status and notes the opportunities that Brexit may provide. The submission states that Bridgend is the only settlement with Layer 2B status and contends that this is going to "restrain" development opportunities. 	<p>Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p> <p>In addition, it is noted that the delivery time for the wastewater improvement project identified on the Irish Water Capital Investment Programme still leaves an interim period of uncertainty for the residents of these areas. The Council has been exploring, and will continue to explore, all avenues for the additional provision of a temporary solution in consultation with other statutory agencies pending the commissioning of the programmed Irish Water improvements.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> The submission concludes by stating that there needs to be a clear strategy for the delivery of infrastructure in the Birdstown area and noting that the special status of Bridgend and the wider Birdstown Area should be duly recognised under the CDP. 	
P43	Friends of Lifford Hospital	Imelda McBrearty	This submission requests that "The retention and expansion of Lifford community Hospital and all services currently provided by it" be put forward as an issue for consideration in the preparation of the County Development Plan.	Comments noted – however, the matters raised are outside the remit of the Draft CDP.
P44		Imelda McBrearty	This submission requests that the "Development of a play area/park in the town of Lifford" be put forward as an issue for consideration in the preparation of the County Development Plan.	Noted. However, the suggested initiative may be more appropriately targeted via an Area Action Plan or similar alternative for Lifford rather than within a strategic policy document that is the County Development Plan.
P45		Adelle Cassidy	<p>This submission relates to access onto the R238 Buncrana to Derry Road which forms part of the 'Strategic Road Network'.</p> <ul style="list-style-type: none"> Background The submission provides details of planning application ref. 07/71378, which saw outline planning permission granted for a house with new access onto the Regional Road R238. Outline permission had been granted at that time on the strength of a policy that allowed access onto the R238 by persons who had owned relevant lands prior to 24th March 2000. The outline permission expired in 2011 and the subject site remains undeveloped. The submission states that, unlike the CDP 2006-2012, the Draft County Development Plan 2018-2024 does not provide any 'exceptions' in terms of access onto Regional R238 and as such the landowner in this case would effectively be precluded from obtaining planning permission. The submission requests that an exception for access onto the R238 is provided by including the following wording in Policy T-P-4; <p><i>Policy T-P-4</i> <i>"An exception will be made for the R238 for person(s) who owned the site that is proposed for development, prior to 24th March 2000, or for their immediate family member, who may be permitted a dwelling with access onto the R238 where the speed limit is greater than 60kph, where all of the following criteria are met</i> <i>-No other non-national road access is available,</i> <i>- Required visibility standards can be met,</i> <i>- They do not conflict with other policy objectives in the Plan,</i></p>	Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>- <i>The proposed access has been designed in accordance with National Roads Authority's Design Manual for Roads and Bridges (DMRB),</i></p> <p>- <i>Documentary evidence is provided that applicant owned the site that is proposed for development prior to the 24th March 2000 or is an immediate family member of a person who owned the site proposed for development prior to 24th March 2000".</i></p>	
P46		Trevor Robb	<p>1. This submission requests that certain lands at Knockybrin be included within the Letterkenny Environs boundary as part of the Donegal County Development Plan 2018-2024.</p> <ul style="list-style-type: none"> Background The submission states that no changes to the zoning of the area have taken place in the last 2 development plans and notes that surrounding lands have been developed in the intervening period. The submission states that rezoning would allow landowners to provide long term development and avoid piecemeal proposals. The submission refers to an existing 'ghost estate' at the southern end of the subject lands and argues that this area should be rezoned to facilitate completion of the estate and enhance the area. The submission states that the topography can cater for development and will not adversely affect the landscape. 	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P47	Donegal Irish Natural & Hill Farmers Association (INHFA)	Seanie Boyle	<p>This submission relates to hill farming and Natura 2000 sites, public access on farmlands and forestry.</p> <ol style="list-style-type: none"> Natura 2000 Sites The submission states that since 2011, County Councils are responsible for managing Natura 2000 sites. Farmers carrying out works in these areas (where planning permission is required) face an additional unfair financial cost due to the need to provide a Natura Impact Statement for works carried out within Natura 2000 areas. The submission requests that Donegal County Council assist farmers with any financial cost in these planning applications and seek to have them reimbursed by the Department Arts, Heritage and Gaeltacht. Public Access The submission notes that the number of hill walkers on private lands is increasing, bringing with it associated management issues. The submission is requesting that DCC provide an awareness campaign relaying the good will of landowners in terms of allowing access to their lands and emphasising certain principles, such as 1) No dogs to be allowed on private lands, 2) Avoid livestock where possible, 3) No interference with boundaries or fences and close all gates, 4) No litter/rubbish, 5) Inform landowner if big groups are involved, 6) Farmers not liable for injury to users. The submission also requests that DCC and other relevant bodies consult with landowners who have their lands frequently accessed by walkers. Forestry 	<p>Comments noted – however, the matters raised are outside the remit of the Draft CDP.</p> <p>Comments noted – however, the matters raised are outside the remit of the Draft CDP.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			The submission raises concerns in relation to the expansion of the forestry sector and suggests that firms and individuals may buy up lands for forestry purposes as a 'carbon off set', which it is argued would not be in the best interests of local communities or the county. The submission requests that DCC provide control and limit the percentage of lands allowed for forestry in DED's. The submission also seeks support for INHFA's call to National Government to limit the awarding of forestry premiums solely to persons that live within 50km of a forestry site.	Comments noted – however, the matters raised are outside the remit of the Draft CDP. Forestry is controlled largely by the Department of Agriculture, Food and the Marine and the Council acts only as a consultee on felling and planting licenses.
P48	MH Associates	John Masterson	<ol style="list-style-type: none"> 1. This submission provides details in relation to lands at Drumnahaogh, Letterkenny (Port Road) that are currently used by a motor home business. The business in question acquired a site adjoining their existing premises in 2007; however, a proposed link road identified in the Draft County Development Plan would pass through and divide this site, leaving areas that would be too small for commercial use. 2. The submission requests that the Council consider the following when preparing the County Development Plan; <ul style="list-style-type: none"> ▪ Omit the Link road proposal ▪ Relocate the proposed roadway to maximise use of the subject lands ▪ Consider the grant of a temporary planning permission on these lands, notwithstanding the currently identified location for the proposed road project. ▪ The writer queries whether DCC would consider purchasing the relevant lands, thereby allowing the relocation of the motor home business? 	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P49		Shaun McBride	<ul style="list-style-type: none"> ▪ This submission relates to lands at Ait an tSeanti, Derrybeg. The submission states that the subject lands are in an area where wind energy development will not be allowed under the terms of the Draft CDP. The submission objects to this as it is contended that significant money has been spent on a grid connection for a wind farm on this land. ▪ If granted permission for a windfarm at this location, the landowner states that he would return to his native parish of Gweedore and invest his money in a new venture that could potentially provide local employment and bolster this Gaeltacht area. 	Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P50	Cement Manufacturers Ireland (CMI)	Brian Gilmore	<ul style="list-style-type: none"> ▪ This submission is made by CMI which are a constituent part of Ibec with 3 Irish members including Irish Cement, Lagan Cement and Quinn Cement. The submission provides a background on the size, scale and investment of the cement industry in Ireland. The submission states that the Cement Industry continues to progress significant Low Carbon initiatives and states that EU directives on the Built Environment now insist that a 'Life Cycle' approach be taken when evaluating the sustainability credentials of buildings and infrastructure. 	Noted.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> <li data-bbox="607 252 1603 453">▪ Draft Donegal Development Plan The submission quotes Part B, Appendix 4, section 1.9 (p227) and declares that it is well intentioned but lacks context and is therefore open to misinterpretation. The submission proposes that 'Life cycle assessment' rather than 'embodied energy' be used when assessing the energy performance of a building and notes that concrete construction may perform better than other materials when viewed over a longer period. <li data-bbox="607 517 1603 922">▪ The submission requests that section 1.9 of the Draft CDP be redrafted and that the term 'green' construction materials be replaced by BEST AVAILABLE TECHNIQUES. CMI submit the following redraft proposal for section 1.9; 'The choice of building materials is important in terms of sustainable development. A 'life-cycle' approach should be taken when considering the appropriateness of materials in any building or infrastructure project. In line with well recognised sustainability principles; economic, social and environmental considerations should inform the choice of materials. It is particularly important, when considering the choice of construction materials, that impacts from their manufacture and during their lifetime in use in the built environment are both considered and evaluated. As regards manufacturing impacts, materials produced to Best Available Techniques, defined by EU Directives, and those which can be certified as being Responsibly Sourced should be preferred. As regards 'in use' impacts in the built environment, these should be considered according to the principles established in certified building assessment schemes.' 	<p data-bbox="1659 284 2101 338">Noted. This issue will be monitored in the context of Building Control provisions.</p>
P51		John Halligan	<ul style="list-style-type: none"> <li data-bbox="607 957 1603 1069">▪ This submission has been made by John Halligan Architects on behalf of Brian McHugh and relates to lands at Woodlands, Letterkenny. The submission requests that the subject lands be included within the Letterkenny Development Boundary and zoned as 'Established Development'. <li data-bbox="607 1101 1603 1155">▪ The submission states that the site is 2.7acres in area and is less than 250m from the administrative boundary of the urban area. <li data-bbox="607 1161 1603 1216">▪ It is contended that the subject site is contiguous to the built up area but inexplicably is not included. <li data-bbox="607 1222 1603 1276">▪ The submission states that the site had planning permission for 4 units (planning ref. 03/6339; expired October 2010 - 1 No. dwelling, service road and services completed). <li data-bbox="607 1283 1603 1337">▪ The site is currently 'unsightly' and is not 'Greenfield' lands. The site would be under-utilised in the absence of the proposed 'Established Development' zoning. <li data-bbox="607 1343 1603 1415">▪ In the opinion of the architect, policy LK-H-P-1 on unfinished estates would allow for development of this site; however, an 'Established Development' zoning would remove any doubt as to its suitability. 	<p data-bbox="1659 957 2136 1098">Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ The proposed development would help implement numerous policies of the CDP, Sustainable Rural Housing Guidelines, complete unfinished development and make efficient use of lands/infrastructure. 	
P52		Cheryl Quinn	<p>Submission made by Cheryl Quinn in relation to wind energy</p> <ul style="list-style-type: none"> • The submission provides a narrative on the personal cost and damage to the landscape caused by the number of wind turbines that have been built and the number that have been given planning permission. • The submission welcomes and cites Variation (No. 2) of the 2012-2018 County Development Plan and welcomes the fact that Variation no. 2 is to be retained in the Draft Plan. • The submission states that Councillors must take their role under the Planning and Development Act seriously and not be bullied in relation to wind energy policy. • The submission asks that the Planning department should furnish all the elected members with details as to the number of wind turbines that have been approved in the county. • The submission welcomes the statement in Chapter 8 to the effect that "Donegal's wind energy resource has already been harnessed to a significant degree", but suggests that the resource will in fact have been fully harnessed once all approved turbines are constructed. • The submission suggests that those doubting the need for a 10xTip height separation distance between turbines and residential properties should speak to families living in the vicinity of Corkermore Windfarm, where it is contended that there are significant issues in relation to noise, vibration etc. from turbines. 	Refer to themed response on Renewable Energy contained in section 3.7 of this report.
P53		Maire Mhic Phaidin	<p>Ba mhaith linn piosa a chuir i bplean Forbartha Contae Dhún na nGall 2018 – 2024 Go bunasach ba mhaith linn bealach rothaíochta/siúlóide cois fharráige a fhorbairt ó Cheantair an Fhálcharraigh thart ar an chósta via Ghort a'Choirce, Ardaí Mhóir isteach go Machaire Rabhartaigh agus Mín Lárach.</p> <p>We would like to add a piece into the Donegal County Development Plan 2018-2024. Basically, we would like a coastal cycleway/walkway to be developed from the Falcarragh area around the coast via Gortahork, Ardaí Mhór in to Magheroarty and Meenlaragh.</p> <p>Céim a haon i gceantar Chloich Cheann Fhaola, Stage One: in the Cloch Cheann Fhaola area</p> <p>Céim a dó: ceangal le Cnoc Fola isteach go Gaoth Dobhair, Stage Two: connection to Cnoc Fola in to Gaoth Dobhair</p>	Refer to themed response on tourism contained in section 3.8 of this report.

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			Céim a trí: isteach go ceantair na Rosann, ag ceangal ceantaireacha Gaeltachta an Iar Thuaiscirt le chéile. le meas Stage Three: in to the Rosses area, tying the Gaeltacht areas of the northwest together.	
P54		Declan and Josie Deery	This submission requests that '....all wooded areas be kept wooded areas for future times. As these woods contain a lot of native trees and wildlife'.	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P55		Mary Grant	This submission notes that the writer has 'six of a family' and suggests that said family should be permitted to build houses in the townland of Glenard.	Refer to themed response on rural housing contained in section 3.5 of this report.
P56		Margaret Madden	This submission refers to the development of rural houses and suggests that the County Development Plan should be amended to give preferable treatment to those seeking to build on family lands in rural areas, as opposed to those persons that are not from rural areas.	Refer to themed response on rural housing contained in section 3.5 of this report.
P57	MH Associates	John Masterson	<ol style="list-style-type: none"> The submission, on behalf of Glenpark Developments, requests the inclusion of lands at Manorcunningham within the settlement envelope for the town for the following reasons: <ul style="list-style-type: none"> A commercial building is currently being constructed on the adjoining site. The extent of the site is a natural boundary for the town of Manorcunningham; it immediately adjoins the settlement envelope for the town to the south. Zoning of the site would increase the commercial viability of the town which acts as a satellite town for Letterkenny, Derry and Lifford. There is good access to the site via a 9.00 wide road from the national primary with a footpath on either site. Existing public services adjoin the site including sewer, water, electricity, broadband and street lighting. There is an existing problem with fly-tipping on the lands which would be addressed if the lands were included in the settlement framework as the site would be properly secured. 	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P58		Michael Ward	<p>The submission requests the removal of Variation No. 2 (Wind Energy) to the County Donegal Development Plan 2012-2018 (as varied) from the Donegal County Development Plan 2018-2024 (CDP) and the inclusion of a ban on wind farm developments from pearl mussel basins for the following reasons:</p> <ol style="list-style-type: none"> Based on the lifecycle of the pearl mussel basin, there is no basis/logic for the ban on wind farms in pearl mussel basins in the CDP 2018-2024. The ban on wind farm developments from pearl mussel basins can stifle development in such areas. The submission cites the following examples: <ul style="list-style-type: none"> Difficulties encountered in the widening of Drumalough Bridge over Stracastle River; 	Refer to themed response on Renewable Energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> • Major problems arose in relation to the new Mullantyboyle Bridge over the Ownea River; Planning for the 110Kv electricity line from Binbane to Letterkenny may not have been granted had the ban on wind farm developments been in place at the time of this application; and • More recently, the ban on wind farm developments from pearl mussel basins has been used as part of an objection to the construction of a water storage reservoir at Derryloughan (planning Reg. ref. 16/51737). <p>3. Concerns raised over the potential for future developments to be restricted as a result of the ban on wind farm developments in pearl mussel basins.</p> <p>4. West Donegal is starved of development and infrastructure and regulations with regard to development and planning will ensure that this continues.</p>	
P59		Sean Sweeney	<p>1. The submission strongly supports the minimum setback distances of 10 times tip height for wind turbines as stipulated in the Draft CDP 2018-2028 and requests that the Council include these setback distances in the final CDP.</p> <ul style="list-style-type: none"> • The setback distance in the current Wind Energy Guidelines of 500m from the nearest dwelling is not deemed acceptable given that some wind turbines are 156.5m high. • The submission notes that the Draft CDP 2018-2024 refers to a non-Executive Report which details findings on blade throw, turbine collapse and fire; however, it is noted that the Draft CDP does not refer to infrasound which can impact health from much greater distances. It is further noted that the non-Executive Report justifies the implementation of the minimum setback distances of 10 times tip height as a prudent precautionary principle. <p>2. The submissions makes specific reference to Cashelnavern Border & Uplands (LCA 40) and Finn Valley (LCA 14) Landscape Character Assessment:</p> <ul style="list-style-type: none"> • Having regard to the proposed Carrickaduff wind farm the submission requests that the Council retain both the Cashelnavern Border & Uplands (LCA 40) and Finn Valley (LCA 14) Landscape Character Assessment areas as unacceptable for wind farm development. • Both areas are rich in biodiversity, with the River Finn and tributaries, as well as Lough Mourne and Lough Carn; any development in these areas would cause significant habitat loss. • The scale of the proposed Carrickaduff wind turbines is out of place in the natural landscape in these areas. • Residents in the area will be impacted by the scale of the turbines, the shadow flicker and the noise from the turbines. • The proposed Carrickaduff wind farm will result in property devaluation in the area. 	Refer to themed response on Renewable Energy contained in section 3.7 of this report.
P60		Brendan Kelly	<p>The submission relates to a site at Cluain Airne, Glebe, Letterkenny.</p> <p>1. The submission requests the rezoning of the site from 'Strategic Residential' to 'Residential' in the CDP 2018-2024.</p> <ul style="list-style-type: none"> • The submission states that the site has planning for 16 houses and is active at present; 	Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The location of the lands were not identified in the submission and

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			a lot of money has been invested in the site to date.	therefore cannot be mapped.
P61	Harley Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.	Jim Harley	<p>The submission requests that Portnablagh be included as a designated settlement in the CDP 2018-2024 based on the following reasons:</p> <ol style="list-style-type: none"> 1. The National Spatial Strategy (NSS) acknowledges that smaller towns and villages have significant potential that should be capitalised on; their strengths lie in their capacity to accommodate employment, residential and other functions on the basis of their comparative advantages in terms of lower costs and a quality of life. 2. The submission refers to the 'demotion' of settlements in the CDP 2012-2018 and request that these settlements, including Portnablagh, should be re-designated in the CDP 2018-2014. 3. The submission notes that while the economic development policies in the Draft CDP 2018-2024 acknowledge the role of rural areas in the County they place significantly more emphasis on development opportunities within designated settlements. Portnablagh is designated a rural area in the Draft Plan and not included in the settlement hierarchy and therefore is at a disadvantage to other designated settlements in terms of attracting economic development. 4. The submission states that there is a lack of opportunities for multiple residential developments in Portnablagh as the residential policy in the Draft CDP 2018-2024 restricts such development in rural areas, further impeding growth in the town. 5. In the interests of attracting residential and/or business/employment development to the town the submission requests that the Council reinstates Portnablagh in the settlement hierarchy. An indicative settlement boundary map for Portnablagh is included in support of this request. 	1-5. Refer to themed response on core strategy and housing contained in section 3.1 of this report.
P62		Ian Mc Cambridge	<ol style="list-style-type: none"> 1. The submission relates to the protection and preservation of Dunwiley Wood, Stranorlar: <ul style="list-style-type: none"> • The submission requests that the designation of Dunwiley Wood as a 'green amenity area' be amended to 'woodland and green amenity area' on the zoning maps which accompany the CDP to ensure the preservation of the woodland area for future generations. • Concerns raised that the Dunwiley Wood could be zoned for residential development • Notes that Dunwiley Wood is an area of outstanding natural beauty which should be protected. 	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P63		Michael and Bernie Heeny	<ol style="list-style-type: none"> 1. The submission relates to the protection and preservation of Dunwiley Wood, Stranorlar and the surrounding area: <ul style="list-style-type: none"> • Notes that Dunwiley Wood is an area of outstanding natural beauty which should be protected. • Concerns raised over the potential for future development to impact on the quiet residential nature of the local area. • Concerns raised over the capacity of the local road network to accommodate future development and large volumes of traffic. 	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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P64		Carol Duddy	<ul style="list-style-type: none"> The submission relates to wind energy with specific reference to existing wind turbines at Corkermore which are approximately 500m from the observers property; The submission strongly supports the minimum setback distances of 10 times tip height for wind turbines as stipulated in the Draft CDP 2018-2028 and requests that the Council include these setback distances in the final CDP. Concerns raised over the noise impacts associated with the existing windfarm at Corkermore including a clunking noise and constant humming, which is amplified at night and also the vibration and flicker impacts which cause sleep deprivation and stress to the family. Concerns raised over health and safety issues relating to wind farms citing an incident on 15th December 2013 when a turbine blade from Corkermore wind farm broke off and embedded itself in a nearby bog. 	1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P65		Francis Mc Ateer	<ol style="list-style-type: none"> The submission is in support of renewable energy, particularly in the Glencolmcille area, and requests the following be included in the CDP: <ul style="list-style-type: none"> The provision of wave power off the coast of Glencolmcille The provision of wind-power in the Glencolmcille area The provision of Hydro-electric power from dammed water on Slieve league 	1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P66		Gerard Columba McLaughlin	<ol style="list-style-type: none"> The submission primarily relates to rural issues but also issues beyond planning. <ul style="list-style-type: none"> The submission requests that DCC revitalise all rural communities by encouraging investment and creating job opportunities which are currently focussed on larger towns and the east coast. Failure by Government to address rural decline and neglect of rural communities. Rural housing should only be granted to locals with ties to the local community. Concerns raised over the number of one-off housing granted to non-locals and Northern Ireland residents in the Burt area in the past. The submission supports the location of telecom masts in the countryside if it improves phone/mobile/broadband services – notes that these should be exempt. Also supports the development of windfarms, but notes that the PSO levy should be reduced as savings are not being passed onto the consumer. The submission notes the requirement for more investment in GP services, hospitals, rural schools, broadband, infrastructure etc. Input from the IDA is also required to attract job opportunities to rural areas. Planning regulations are restricting growth in rural areas in particular in relation to the design of one-off housing. The existing electricity grid in Donegal is not capable of accommodating the future growth required in the County, this needs to be developed further to plan for the future. The submission also requests that a site at Speenoge, Burt be zoned in the CDP. Map is provided outlining the site but does not state the zoning required. 	<ol style="list-style-type: none"> Refer to themed response on rural housing contained in section 3.5 of this report and to themed response on Infrastructure contained in section 3.3 This submission is noted – however, no details are provided in relation to the proposed zoning and in any event, specific zonings are not being applied to rural areas.
P67		Declan	<ol style="list-style-type: none"> The submission relates to lands at Ballyraine, Letterkenny identified as Opportunity Site 16 	1. Refer to themed response on site specific

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
		Reynolds	<p>(LK-OPP-P-16: Kilty) in Part C of the CDP (which occupies the site of former UNIFI plant) and requests the following:</p> <ul style="list-style-type: none"> • Rezoning of Opportunity Site 16 to allow for residential development on the portion of the site which is occupied by Kilty Lodge and outbuildings to meet the housing shortfall in Letterkenny in accordance with the Core Strategy in the CDP. • Suggested re-wording of policy LK-H-P-1 to read as follows (suggested text in blue): <i>"It is the policy of the Council that new housing development shall be guided to those lands identified as 'Primarily Residential-Phase 1' and to those lands identified 'Opportunity sites 1, 10 and 16 - 1st phase' on the accompanying Map 12.1B. Letterkenny land Use Zoning' that accompany ies this part of the Plan."</i> • Suggested amendment to Policy LK-ED-P-7 to read as follows (suggested text in blue): <i>"The planning frameworks set out for each 'Opportunity Site' shall form a guide to the type of development that may be appropriate at each location and, where residential development opportunities are identified (sites 1, 6, 7, 9, 10 and 16), the planning framework also applies a phased approach in accordance with the Core Strategy. In this regard, the list below sets out the 'Opportunity Sites' where residential development opportunities are identified and also, for clarity, states whether the particular site forms part of Phase 1 and Phase 2 as regards the residential element (Opp Site 1, 10, 16-phase 1 with Opp 6, 7, 9 Phase 2)"</i> • Suggested amendment to Policy LK-OPP-P-16 Kilty (suggested text in blue): Remove the wording "Residential development shall not be permitted on this site" and replace with the text to confirm that <i>"Residential Phase 1 will be accommodated on this site"</i>. 	<p>zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P68		Anne Marie McDermott	<p>1. The submission relates to Wind Energy:</p> <ul style="list-style-type: none"> • The submission supports the minimum setback distances of 10 times tip height for wind turbines as stipulated in the Draft CDP 2018-2024. The observer notes the positive effects this will have in relation to noise impacts on residential dwellings. • The submission welcomes the protection afforded the 6 named river basins for the protection of our waterways. It is noted that this will have a positive impact on tourism for County. • The submission suggests that other forms of renewable energy (not just wind) should be considered in achieving energy targets for the County. • The submission refers to discrepancies in relation to areas where augmentation of existing turbines is allowed. The observer notes that this designation appears to have been applied to areas which do not have existing turbines nor have extant permissions for example the Glen of Glenties and asks that in light of these discrepancies the mapping be reviewed. • The submission notes that the household water reservoir of Derkmore, the nearby 400 year old oak wood and an area of nearby land which Irish Water intends to build a reservoir on have all been designated as suitable for wind farming and the observer 	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			requests that this be re-assessed.	
P69	Planning and Research Solutions	Peter Crossan	<p>1. The submission relates to Wind Energy:</p> <ul style="list-style-type: none"> The submission strongly supports Variation No. 2 of the current CDP 2012-2018 in respect of the protection of the Freshwater Pearl Mussel Catchment Areas and as well as minimum setback distances of 10 times tip height for wind turbines and requests that the wording of the variation be included in the new CDP. The submission contends that the provisions of Variation No. 2 are not affected by the Ministers circular PL 5/2017 on the Interim Wind Guidelines which were issued under Section 28 of the P&D Acts and as such should be included in the new CDP. The submission also states that a detailed evidence base was presented at the workshop of the Council in April 2017 in support of provisions of Variation No. 2 for inclusion in the Draft CDP and urges the Council to retain the wording in the new CDP. 	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>
P70		Seamus Bovaird	<p>The submission relates to Aquaculture, Fishing, Harbour Infrastructure and Coastal Heritage:</p> <p>1. In relation to Aquaculture the submission raises a number of concerns as follows:</p> <ul style="list-style-type: none"> Due to lack of progress in local regulation shellfish operations in Lough Foyle are operating unregulated at present. The lack of regulation of the shellfish operations in Lough Foyle is impacting on the local employment opportunities and revenue which could be derived from the industry. Neither state, Ireland or NI, are taking responsibility for health and safety risks, food health risks, anti contamination risks or the transport regulations that protect the seafood industry and the consumer. If any contamination risks were to be traced back to Lough Foyle it could have the potential to destroy the established shellfish industry in Lough Swilly and Trawbreaga Bay. The submission states that DCC has failed to prepare an Environmental Status Plan for Lough Swilly which is required to assess new aquaculture licences against in order to determine the impact of the application on the Lough. This has restricted the growth of aquaculture in Lough Swilly for over 5 years resulting in an ad hoc approach with temporary licences approved. The Council needs to put Environmental Status Plans in place across the County. The growth of the aquaculture industry on Lough Foyle is being restricted by lack of common legalisation across the two jurisdictions and the lack of adequate sewage treatment from the Donegal side of the Lough. Remedial actions should be highlighted in the CDP. <p>2. In relation to Fishing the submission raises a number of concerns as follows:</p> <ul style="list-style-type: none"> Concerns raised in relation to the potential negative impact of Brexit on the fishing industry in Donegal; a caveat to this effect should be included in the CDP. As part of Brexit the UK will cancel the London Fisheries Convention, signed in 1964 which will affect all Donegal fishing boats. This will impact smaller fishing boats immediately by exclusion from fishing within the UK 12-mile which is extremely relevant to the Inishowen fleet, many of whom have UK registered fishing boats. 	<p>1. to 3. Comments noted – however, the matters raised are outside the remit of the Draft CDP.</p> <p>4. The Draft CDP contains a suite of policies and objectives to protect the built heritage of the county including heritage at coastal locations. The Council are satisfied that the RPS has been prepared in accordance with the relevant legislation and guidelines. The submission also refers to specific issues which are outside the scope of the Draft CDP.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> • Given the location of the Inishowen fishing grounds which abut the UK 12-mile limit it is important that the boundary between UK and Irish territorial waters from Muff is established quickly. <p>3. In relation to Harbour Infrastructure the submission raises a number of concerns as follows:</p> <ul style="list-style-type: none"> • The CDP should include a dredging policy and an infrastructural maintenance policy for the protection of harbours and piers. Harbour infrastructure should have the same projection as roads under the CDP. • The submission notes the impending Council Report on the status of the County's Piers and Harbours which will include the results of the Coroners' Report on the drowning off Buncrana Slip and states that this should be taken into consideration in the final CDP. • The submission requests that the 2004 Deloitte and Touche Report in Marina Projects should be downgraded from a priority list to a reference report. The observer claims that the Report has been given a status that was never attended and coastal infrastructure projects are only considered based on their ranking in the Report which has resulted in some bad decisions in the past e.g. Bunagee marina project. <p>4. In relation to Protection of Coastal Heritage the submission raises a number of concerns as follows:</p> <ul style="list-style-type: none"> • Concerns raised over the lack of protection of coastal heritage and the built heritage in coastal locations which should be enshrined in the Development Plan. • Large areas of coastal landscape have been destroyed by holiday homes and other developments in coastal locations. • The submission criticises the Council's approach to the preparation of the RPS and claims that the needs of landowners was put before the protection of the heritage. • The submission cites a number of examples where coastal heritage has been destroyed by developments including the Coastal Defence Fort and Artillery Barracks in Greencastle, Northburgh Castle. The submission claims that conditions that were attached to the planning permission for the barracks in Green castle were never policed by the Council. The submission further claims that a developer was allowed to build a new access road within 3m of Northburgh Castle without any archaeological surveys or protective works to the castle built in 1305. This development cut off the seaward side of the fort to locals and tourists. • The submission raises concerns about two current planning applications (no reference provided) for further changes to the artillery barracks part of the Greencastle fort complex to facilitate holiday home developments. • The submission claims that the protection of the coastal heritage is left to the Public to police through the objections and appeals citing an example in Moville in relation to a public pathway along the seafront. 	
P71		Danny & Kathleen O'Dwyer	1. The submission relates to windfarms and states that they are satisfied that the area of Meenahinnis, Killygordon is not open to consideration for wind farms and requests that this position is also reflected in the final Plan in the interests of health and so that the	1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>community can enjoy living in their areas.</p> <p>2. The submission states that windfarms should be located off-shore. States that this view is strengthened through recent presentation by professor Mariana Alves-Pereira in which she pointed out serious concerns relating to the impact of wind farms referring to infrasound and low frequency noise (attached a news article in this regard).</p>	<p>to in the submission can be viewed in Appendix B of this report.</p> <p>2. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>
P72		Bill Coffey	<p>1. The submission relates to aquaculture and states that they are disappointed with the new Draft Donegal Development Plan.</p> <p>2. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed.</p> <p>3. The submission raises concerns in relation to expansion of EHSA along the coast and disagree that the coastal area falls within the EHSA definition due to manmade structures and aquaculture installations and a blanket ban will restrict rural coastal economic development.</p>	<p>1 to 3. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.</p>
P73		Raymond and Patricia Treacy	<p>1. The submission relates to designation of Dunwiley Wood, Stranorlar</p> <p>2. The submission requests that Dunwiley Wood be designated so that no housing or other development would be allowed within the wood for the following reasons:</p> <ul style="list-style-type: none"> ▪ It is an important ecological landscape ▪ Woodland has evolved naturally with native trees, plants and wildlife and this is a rarity so close to an urban area. ▪ Wood serves as a sponge and reservoir allowing slow seepage of water into the drainage system. ▪ Such areas must be preserved to prevent extinction of ecological structures. 	<p>1. & 2. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P74		Don and Noreen Graham	<p>1. The submission requests that Council consider to allow development (nature of development unstated) of land at Lacknaco, Churchill as previously granted in on 2/12/99 (reference number of planning permission granted not supplied in the submission). States that the land adjoins a property and residence.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P75	MH Associates	G. Smeaton	<p>1. Requests inclusion of lands at Kiltole, Convoy within the settlement envelope boundary of Convoy and to zone the lands 'Residential.' The submission provides the following additional supporting information:</p> <ul style="list-style-type: none"> ▪ Notes that convoy is a layer 3 town in the Draft CDP and is a town for regeneration. ▪ States that the site was previously located within the settlement envelop of Convoy and permission was previously granted for 42 units (now expired). Advises that an EOD application was refused as the site is now located outside the boundary (12/60030). 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>States that the exclusion of the site from the settlement envelop in 2012 seems to have been quite arbitrary and was done at a time when little multiple development was taking place.</p> <ul style="list-style-type: none"> ▪ States that the principle of development of an appropriate scale is acceptable. ▪ States that the site can be seen as part of a larger development known as Flaxfields and that the roads, services and sewer network serving Flaxfields will also serve the proposed site and capacity is available in the network. ▪ Informs that Meadowfield Developments have completed the adjoining development to a high standard. ▪ States the site is suitable for social housing due to proximity to town centre. ▪ States the site is essentially already 'serviced.' ▪ States that some works have already been carried out on site. 	
P76	MH Associates	G. Smeaton	<p>1. Request lands at Admiran, Stranorlar to be zoned as 'Residential' and provides the following additional supporting information:</p> <ul style="list-style-type: none"> ▪ Provides a background that the site is currently within the settlement envelop but is not currently zoned for specific use. Advises that planning permission was previously granted for 36 units (04/9302) which has now expired. ▪ Notes current planning permission exists (12/60072) for residential development and it will expire 24/02/18. Notes that construction had commenced but stopped in 2008 due to the national economic situation. ▪ States that the lands are not located in a Natura 2000 site. ▪ Notes the shortage of zoned residential lands within Ballybofey-Stranorlar and states that other lands should be positively identified and zoned and to this end states that the site could yield up to 16 much needed units. ▪ States that the site could be considered brownfield due to the previous works commenced. ▪ States that the landowners are in a position to develop the site immediately but note the expiry date of permission. States that a zoning in the Plan would allow a revised higher density application to be made. ▪ States that the site would be suitable for social housing being within walking distance of all town amenities. ▪ States that major infrastructural improvements would not be required. ▪ States that the 3 parcels of land zoned in the Draft CDP are unlikely to be developed and therefore alternative sites should be considered. ▪ States that the proposed zoning would allow the current owners to transform the unfinished estate legacy. 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P77	Martin O'Donnell	Martin O'Donnell	<p>1. Submission requests the rezoning of lands from 'Strategic Residential Reserve' to either 'Opportunity Site' or 'Primary Residential' at Rockytown Road, Ballymacarry, Buncrana and</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
	Architectural Consultant		<p>provides the following information in support:</p> <ul style="list-style-type: none"> ▪ The lands had been zoned Primarily Residential in the Buncrana and Environs Development Plan 2008-2014 however as a result of a material contravention process, permission was granted for shops/offices (ref 11/90016). Also informs that a subsequent EOD of that permission was refused on 26/05/16. ▪ States that the review of the Buncrana plan was undertaken in 2013, less than one year after the permission had been granted and therefore states that at this time, the review of the plan should have rezoned appropriately. ▪ The development of the site would enhance the area visually and benefit local residents. ▪ The Rockytown Road would be upgraded if developed. ▪ During extension of inner relief road all services were designed and extended to cater for this site. ▪ Submits relevant maps, drawings, photographs and schedule of permission granted. 	<p>this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P78	Martin O'Donnell Architectural Consultant	Martin O'Donnell	<p>1. Submission relates to 3 plots of land at Gulladoo, Moville Relevant maps, drawings, photographs and information on permission granted accompany the submission. It requests that:</p> <ul style="list-style-type: none"> (i) The settlement envelop of Moville be extended so as to include Plot no 1 and zone it as 'Residential' and advises that permission was granted and extended under 11/70083. Advises that 13 dwellings permitted at this location were not constructed due to the downturn. (ii) Plot no 2 be zoned as 'Residential' as it is an infill site, its development would enhance the area visually and for the benefit of local residents and roads and services have been extended to cater for this site. Submission notes that this plot of land is already located within the settlement envelop. (iii) That the settlement envelop of Moville be extended so as to include plot no 3 together with existing adjacent residential development and that plot no 3 be zoned as 'Residential'. The submission states that services were designed to cater for this area. 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report</p>
P79	Martin O'Donnell Architectural Consultant	Martin O'Donnell	<p>1. Submission requests that the settlement envelop of Moville be extended to include lands at Glencrow, Moville and that these lands together with adjacent lands that are already within the settlement envelop, be zoned as 'Residential'. The submission gives the following reasons in support:</p> <ul style="list-style-type: none"> ▪ The land proposed as phase 1 (the lands already located within the settlement envelop) in the development already has planning permission for 44 houses therefore the use has already been established. ▪ The land proposed as phase 2 of the development (currently located outside the settlement envelop) is almost landlocked by industrial development with a boundary adjoining the proposed residential development to the south. ▪ States that the Planning Authority had no objection in principle to residential 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>development located at phase 2 in 2007 and submits a letter as evidence as well as overall site layout map.</p> <ul style="list-style-type: none"> ▪ State that the sites are a good location for social and affordable housing. ▪ Submits relevant maps, drawings, photographs, schedule of permission granted and letters from the Planning Authority. 	
P80	Cruit island Residents Committee	Alan Doherty	<ol style="list-style-type: none"> 1. The submission relates to support the designation in the draft CDP of Cruit Island shoreline as EHSAs as well as at Belcuit/Kincasslough/Gortnasade/Keadue and the submission requests that this protection is continued for the following reasons: <ul style="list-style-type: none"> ▪ The coastline is a designated SAC and SPA. ▪ The coastline provides local people with natural amenities and recreational activities and this in turn improves quality of life, attracts people to the area and grows rural areas. ▪ It also serves as a natural amenity for tourists. ▪ The recreational and amenity value of the coastline has led to local employment and small businesses being set up to harness this value. ▪ The area is used for education purposes by local schools. ▪ Refers to the Core Strategy text in relation to Layer 3 in the settlement structure and states that designating Cruit Island as EHSAs will support sustainable economic development and protect against short-sighted decision making. ▪ References natural heritage policies in relation to managing areas in a sustainable manner. 	1. Noted
P81	Seacrest Seafoods	Liam McGuinness	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSAs along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSAs definition. 3. Considers the coastal extension of EHSAs appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P82	McGabhann Architects	Antoin MacGabhann	<ol style="list-style-type: none"> 1. The submission requests that lands located on the southern side of the River Swilly, Letterkenny be identified as a 'Strategic Growth Area' and that it would be made up of the 	1. to 4. Refer to themed response on site specific zoning requests contained in section

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>following components:</p> <ul style="list-style-type: none"> (i) A new neighbourhood adjoining the town centre with a build out timescale of 10-20 years. (ii) Improved roads infrastructure including a bridge over the Swilly. (iii) Cycle/Pedestrian routes and linkages including pedestrian bridge over the river. (iv) Town park and greenways (v) Neighbourhood retail and community facilities. (vi) Integration of the River Swilly (vii) Reservation of lands for education facilities (viii) Cemetery facilities. <p>2. The submission notes that the current zonings of the lands are 'Opportunity Site' and 'Strategic Residential Reserve.'</p> <p>3. The submission outlines the range of issues that require address in Letterkenny including roads infrastructure, the potential of the river, unbalanced growth, demand for housing, housing choice, deliverability of existing housing sites and supporting infrastructure.</p> <p>4. The submission states that the lands in question are at the heart of the proposed 'Strategic Growth Area' and the area should be identified as such for the following reasons:</p> <ul style="list-style-type: none"> (i) It is located close to the town centre therefore ensuring sequential growth. (ii) It will contribute to the vitality and viability of the town centre. (iii) It will be developed in tandem with key roads infrastructure improvements. (iv) It will increase the range and choice of housing opportunities in Letterkenny. (v) It will ensure sufficient land is available for new house building (vi) It will provide further cemetery provision. (vii) It will ensure educational facilities are developed within communities they serve. (viii) It will open up access to parts of the river (ix) It is free from constraints relating to physical, flood risk, ground stability or vehicular access difficulties. 	<p>3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P83	Moville Mussels	Liam and Raymond McGuinness	<ul style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural 	<p>1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			coastal locations.	
P84	Community Centre Glenties	Mary Thompson	<ol style="list-style-type: none"> 1. The submission is made on behalf of the Glenties Tidy Town Committee to support Glenties' entry in the Tidy Towns Awards for 2018. The submission provides a narrative on the success of Glenties in relation to Tidy Towns and the tourism potential of the town. 2. Notes the reason identified in the plan for the identification of Glenties as a strategic town and suggests in addition it should be identified in relation to its (i) Built and archaeological heritage and (ii) sport and recreation and (iii) the culturally and politically important MacGill Summer School/ proximity to the Laurels. 3. The submission supports policy TV-P-7 in relation to shop fronts. 4. The submission identifies a number of other areas that need addressed in the town including the following: <ol style="list-style-type: none"> (i) The courthouse and fire station in Glenties are in need of repair. Notes the courthouse is on the RPS and could be used to local benefit such as a Men's Shed. (ii) Upgrading, lighting and enhancing of the bridge and the submission notes that this was the subject of an application to the Town and Village Renewal Programme 2017. (iii) Footpaths in Glenties needing repair (suggests works could be done if materials were provided) (iv) Enhancing approach roads to Glenties (v) Suggests the sewerage system in Glenties should be extended to the town boundary. (vi) Specific buildings need repair (Courthouse and Fire Station) (vii) Suggest the appointment of tourism support officer in west Donegal. (viii) Suggests that public art work would enhance the tourism experience in Glenties. (ix) Requests directional signage for Glenties erected at all relevant junctions. (x) There is potential for the development of the old railway line between Glenties and Fintown. (xi) The submission also provides extracts from the 1981 Plan for Glenties. 	<ol style="list-style-type: none"> 1. Noted 2. Noted 3. Noted 4. Comments noted – however, the matters raised are outside the remit of the Draft CDP.
P85		Danny & Christine Doherty	<ol style="list-style-type: none"> 1. The submission requests that the zoning of lands at Cockhill Road, Buncrana be rescinded or amended from 'infrastructure'. No map accompanies the submission and the submission does not suggest an alternative zoning. It sets out the following reasons for the request: <ul style="list-style-type: none"> ▪ Lands are privately owned and it is not clear why the land has been chosen for an 'infrastructure' zoning. ▪ Outlines that a pumping station has been constructed on part of the site and there have been recent discussions with Irish Water in relation to the construction of a storm water tank on another portion. States that the aforementioned utilities relate only to a small portion of the area zoned 'Infrastructure' and there is no other information to indicate that there are further infrastructure plans. States that apart from the lands for waste water purposes, there are no clear or transparent reasons for the extent of this zoning. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P86		Michael Quinn	<ol style="list-style-type: none"> 1. The submission describes the wind energy strategy of the plan as a more balanced approach and outlines support for it including full support for the ten times tip height set back distance and inclusion of FWPM catchments as 'Not Acceptable'. 2. Supports the statements in Chapter 8 that 'Donegal's wind energy resource has already been harnessed to a significant degree' and also states that it far exceeds its target. 3. States that permitting more wind farms would detract from the scenic and environmental resource and have a negative impact on tourism. Submission refers to a recent survey in Scotland (on behalf of the John Muir Trust) which found that 55% of respondents were less likely to venture into areas of the countryside industrialised with giant turbines. 4. States that the Draft Plan incorporates the policies of Variation No 2 and it also provides details of the process relating to Variation no. 2 including the level of public submissions, the Ministerial Direction and the quashing of the Ministerial Direction. 5. The submission also raises the revised wind energy guidelines and states that 500m or 4x tip height is an insult to rural communities. It also states that the guidelines are only proposals as yet. 6. States that, having taken professional expert advice, Circular PL5-2017 is merely 'advisory' and is of no substance or robustness whatsoever. Suggests that the elected members are beyond the stage to be bullied by a minister. 7. States that in any case, the set back distances in the Draft CDP are simply a continuation from the previous plan. 8. Outlines recognition that national policy must be regarded but states that this must be done with a balanced view as to the impact of wind turbines on the environment and its people and that local authorities have decision making powers under the Planning Acts. 9. States that the document entitled 'submission in relation to amendment document 'Option 3 Revised' to the Working Draft County Donegal Development Plan 2018- 2024' provides the necessary evidence base. Suggests that the report should be included in the plan for transparency. 10. States that turbines can add to flooding problems. 	<ol style="list-style-type: none"> 1. to 10. Refer to themed response on renewable energy contained in section 3.7 of this report.
P87	Inishowen Wind Energy Awareness Group IWEAG	Mary Crumlsh	<ol style="list-style-type: none"> 1. States that policy S-O-6 (relating to protecting and enhancing the quality and diversity of the environment) should be adopted. Agrees with policy WES-O-6 to minimise air/noise pollution. 2. Supports the policies set out in Chapter 7- Natural and Built heritage. 3. In relation to the wind energy strategy, the submission states that the separation distance of 10 times tip height is maintained in the plan and the submission agrees with the 3 classifications for wind farm development (Open to consideration, Not acceptable, acceptable for augmentation). The submission welcomes the challenges identified in Chapter 9 (tourism) to achieve tourism potential. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted and refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report. 3. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P88		Marian McCormick	1. Submission states that the separation distance of 10 times tip height is maintained in the plan and the submission agrees with the 3 classifications for wind farm development (Open to consideration, Not acceptable, acceptable for augmentation).	1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P89		Kevin McGrory	1. Requests that lands at Ballyboyle, Donegal Town be included within the proposed new town development boundary of Donegal Town. There is no map to accompany the submission. The following supporting information is provided: <ul style="list-style-type: none"> ▪ Outlines intention to obtain planning permission for 6 dwelling with waste water treatment systems for family members. ▪ States there has been considerable commercial development close to the lands in the last 10 years including holiday homes and permission for a factory unit. 	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The location of the lands were not identified in the submission and therefore they cannot be mapped.
P90		Ronnie Gilmore	1. The submission relates to 'Local only' clause in relation to rural housing and that this should be reviewed as he is resident for 52 years and that he cannot get planning permission on a site 15mins away	1. Refer to themed response on rural housing contained in section 3.5 of this report.
P91	Cullinane Steele Architects on behalf of GR & GR Boal	Bill Steele Cullinane Steele Architects	1. The submission requests clarification that lands at Pinehill Industrial Estate, Mountain Top, Letterkenny are zoned as 'commercial' on the land use zoning map. Outlines that the written statement, specifically LK-ED-P-4 relates to developments in commercial zones and clearly identifies lands at Mountain Top however the land use zoning map shows the area in a grey colour which is 'Established Development.' 2. Outlines that the lands were enshrined as 'Commercial' in the Letterkenny and Environs Development Plan 2009- 2015 and it requests that this is maintained and reflected in the CDP. 3. States that this area is a commercial area and that any development on the lands is intended to be in keeping with that use.	1. to 3. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P92		David Stevenson	1. Submission refers to a previously proposed 'LYIT Strategic Future Zone' at Ballyraine Road, Letterkenny in 2009 and objects to any such developments being carried out by LYIT as well as commercial development. 2. Submits a letter dated April 2009 for then Cllr Jimmy Harte to Ballyraine Road Residents to inform that at that time, the 'LYIT Strategic Future Zone' was omitted from the plan. 3. A map accompanies the submission but it does not clearly mark the precise area concerned.	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report. 2. Noted.
P93		Ann Gallagher	1. Submission outlines support for windfarms and states that money has to be put into local communities. 2. States that there should be total upgrade of roads and roadside verges should be	1. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>maintained.</p> <ol style="list-style-type: none"> 3. States that footpaths in Pettigo need to be renovated and refers to a signed petition for a new footpath at Carrick. 4. States that rivers need to be cleaned to protect from flooding and particularly references the River Finn. 5. Suggests 'SI' housing schemes should be brought back again. 6. Suggest government should provide 90% grants for refurbishment of derelict structures 7. Suggests the government should be giving 100% grants to send students to Gaeltacht college. 8. States that old peoples homes need to be checked for insulation and lighting before winter months. 9. States that public toilets are important for visitors. 	<ol style="list-style-type: none"> 2. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 3. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 4. Refer to themed response on flood risk contained in section 3.4 of this report. 5. to 9. Comments noted – however, the matters raised are outside the remit of the Draft CDP.
P94		Ann Gallagher	This not an actual submission but rather is a forward email acknowledgment	Noted.
P95	MH Associates	John Masterson	<ol style="list-style-type: none"> 1. Requests that lands at Kiltoy, Letterkenny be rezoned from 'Opportunity Site 16' to 'Residential' for the following reasons: <ul style="list-style-type: none"> ▪ The site is adjacent to the new "Educate Together" site and the school is under construction. States that the school would benefit from residential development in the area. ▪ States that only a limited number of sites have been identified in the Letterkenny Plan and none have delivered housing. ▪ The location is served by good road structure, including footpaths and all other services. ▪ States that the owner is in a position to advance a planning application and a residential development if permitted. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P96	MH Associates	John Masterson	<ol style="list-style-type: none"> 1. Requests lands at Ballyraine, Letterkenny be rezoned from 'educational' to 'primarily residential' and provides the following additional supporting information: <ul style="list-style-type: none"> ▪ States that only a limited number of sites have been identified in the Letterkenny Plan and none have delivered housing. ▪ States that since the adoption of the plan, 2 schools have been constructed in Letterkenny namely the Gael Scoil and Educate Together. ▪ The property is serviced by all public infrastructure and is very accessible to shops, churches and public amenities. 	<p>Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P97	Ecopower Developments Ltd	Philomena Kenealy	<ol style="list-style-type: none"> 1. Requests that the wind energy policy be modified to actively encourage up-rating and extensions to existing and permitted wind farms suggesting that this would have least cost to the environment and continue to support existing wind energy in the county. In this regard makes two points as follows: 	<ol style="list-style-type: none"> 1. to 4. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ Supportive policy for existing wind farms should also apply to permitted but not commenced windfarms as there can be lengthy lead in times and; ▪ Augmentation of/ improvements to existing or permitted windfarms located in Natura 2000 sites should at least be open for consideration if it can be demonstrated that the proposals would not be contrary to the conservation objectives of the Natura 2000 site. Also notes that a total ban on Natura 2000 site is contrary to the EU Commission advice on the implementation of the Natura 2000 regulations. <p>2. Specifically proposes that section 8.2 be amended as follows (with new text shown in blue and text for deletion shown in strikethrough):</p> <p style="padding-left: 20px;">` 2) Acceptable for augmentation of/improvements to existing windfarms': Within these locations, wind farm development would be unacceptable save as augmentation of, or improvements to, existing or permitted wind farm development subject to compliance with all other objectives and policies of the Plan.</p> <p style="padding-left: 20px;">3) 'Not acceptable': Locations where Wind Farm Development would be unacceptable. Areas where wind energy proposals would be unacceptable have been identified having regard to their significant environmental, heritage and landscape constraints. These include; Special Areas of Conservation (SAC's) and Special Protection Areas (Natura 2000) sites, Natural Heritage Areas, areas identified as high and medium landscape sensitivity, areas of Fresh Water Pearl Mussel including the catchments identified in the Sub-Basin Management Plans for Clady, Eske, Glaskeelin, Leannan, Owencarrow and Owenea (as listed in S.I. 296 of 2009), important views and prospects, among others. It is considered that these areas have no limited capacity for wind energy development.</p> <p>Suggested Changes to 8.2.3 Policies Wind Energy E-P-12 It is the policy of the Council to Consider the development of appropriate new wind energy developments within the areas identified as 'Open To Consideration' on the Wind Energy Map 8.2.1, subject to compliance with all other relevant objectives and policies contained within this Plan.</p> <p>Consider the augmentation, upgrade and improvements of existing or permitted wind farm developments within areas identified as 'Acceptable for augmentation of/improvements to existing windfarms' on the Wind Energy Map 8.2.1 on a case by case basis subject to compliance with other relevant objectives and policies contained within this plan and the following:</p> <p>3. Specifically proposes that section 8.2.3, E-P-12 be amended as follows (with new text shown in blue and text for deletion shown in strikethrough):</p> <p style="padding-left: 20px;">'Consider the development of appropriate new wind energy developments within the areas identified as 'Open to Consideration' on the Wind Energy Map 8.2.1, subject to compliance with all other relevant objectives and policies contained within this Plan.</p>	

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>Consider the augmentation, upgrade and improvements of existing or permitted wind farm developments within areas identified as 'Acceptable for augmentation of/improvements to existing windfarms' on the Wind Energy Map 8.2.1 on a case by case basis subject to compliance with other relevant objectives and policies contained within this Plan and the following:</p> <p>(a) Repowering Repowering is the process of replacing older turbines models with newer ones that either have a greater capacity or more efficiency which results in a net increase of power generated. Repowering may also seek to extend the overall lifespan of the development. Proposals for repowering, shall not result in a net increase in turbines, and it shall be demonstrated that there is no additional adverse impact on the receiving environment; or</p> <p>(b) Extension In areas located outside of Natura 2000 sites, pProposals for an extension to an existing wind farm (of up to 20% in terms of permitted numbers of turbines or in cases where 5 or less turbines are permitted in a wind farm, one additional turbine, or in cases where less than 5 turbines are permitted, 2 additional turbines) will be considered. The proposal will be required to demonstrate that the additional turbines may be served by the infrastructure serving the existing development; or</p> <p>(c) Reapplication in areas located outside of Natura 2000 sites, where an existing wind farm has been permitted and this permission has expired or a windfarm is permitted but not already constructed, a revised proposal will be considered within the planning unit of the previously permitted development, and where it is demonstrated that there is no net increase in turbines.'</p> <p>4. Specifically proposes that section 8.2.3, E-P-16 be amended as follows (with new text shown in blue and text for deletion shown in strikethrough): E-P-16 It is a policy of the Council to support the strengthening and enhancement of the capacity of existing or permitted wind farms, within the local environmental capacity including the sustainable upgrade/replacement of older turbines with newer and more efficient models'.</p>	
P98	Ardara GAP Heritage and History group	Paula Harvey	<p>1. The submission provides a narrative on the aims and objectives of the Ardara GAP Heritage and History Group and sets out a number of the groups achievements. The submission provides suggestions as follows;</p> <ul style="list-style-type: none"> ▪ The heritage value of the area should be considered in any land use planning decisions and use RMP maps and no work should interfere with archaeological sites. ▪ Access to heritage sites should be improved with adequate signage. 	<p>1. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ Old homesteads including ruins and other structures should be protected. ▪ Doon Fort area should be designated a special heritage area for conservation having regard to its heritage value. ▪ The Downstrands area should be accorded special Heritage Status having regard to its heritage. ▪ Assistance should be provided in developing a pathway from the ringfort to Ardara. ▪ Ardara (Heritage Town) should be considered for an injection of funding from Town and Village Renewal Scheme. ▪ Suggests that nay new building construction should not be undertaken until the fabric of the fabric of Ardara is addressed. Fabric of town to be addressed. 	
P99		Karl King	<ol style="list-style-type: none"> 1. The submission generally relates to greenways, hedging, SACs, invasive species and amenity areas in Bunrana and specifically suggests the following: <ul style="list-style-type: none"> ▪ Provide for a greenway of sensitive design starting at Ballymacarry roundabout following the old railway line to Derry so as to promote cross border tourism and provide a safe environment for exercise. ▪ Screening in the form of hedging and trees should be provided for on the approach road to Bunrana town from Derry. ▪ Green lines (hedges, verges, trees) are important wildlife corridors and should be maintained and improved. ▪ The Lisnakelly to Swan Park green corridor be developed to allow greenway access from Porthall and Pillar Park areas to Swan Park ▪ Provision is made to continue Swan Park walkway to include pedestrian bridge ▪ Planning Permission should not be granted for development within 20m of a river bank. ▪ All existing woodland should be protected and planting out new areas should be encouraged ▪ More needs to be doe to address invasive species of Japanese Knotweed ▪ The area north of Swan Park should be kept as an amenity zone. ▪ Make provision for collective funding for the funding of a single large scale amenity. Recreational area fro housing development bonds. ▪ No car access on any beach ▪ Provision should be made for more cycle lanes and pedestrian only zones within urban centres. ▪ Donegal County Council should liaise more with voluntary groups. 	<ol style="list-style-type: none"> 1. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.
P100		Joseph Brennan	<ol style="list-style-type: none"> 1. The submission suggests reorganisation of the wind energy chapter as regards the sub-heading 'Context' which is currently placed after 'wind energy' as it is not purely focussed on wind energy and might be better placed immediately after the chapter aim. Suggests that there should be a 'context' section specifically for wind energy and providing for (i) stating the high number of turbines that Donegal already hosts (ii) alluding to those having become 	<ol style="list-style-type: none"> 1. to 8. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>a highly contentious issue in recent years and (iii) recognising the acclaim Donegal has achieved as a tourist destination in recent years.</p> <ol style="list-style-type: none"> 2. Refers to Circular PL 5/17 and describes it as still being advisory and predicts that it will not be finalised within the lifetime of this Government. The submission states that two Ministerial Directions on the wind energy Variation were tested in the High Court and DCC were found to have no case to answer. States that by virtue of the 2014 variation, Donegal has the 10 times tip height turbine separation from homes in its current CDP and therefore to continue this policy is abiding by the Ministers Circular as it is not amending the CDP. 3. Refers to the wind energy map, (Map 8.2.1) and states that there is an error in the augmentation areas at Glenties /Straboy as there are no existing turbines there to augment. 4. Suggests additional text for insertion on page 128 to follow the paragraph numbered (2) so as to state: <ul style="list-style-type: none"> 'A perusal of the wind turbine map of Donegal from the IWEA clearly shows in the order of 100 turbines reaching end of life during the period of the next plan. Most are smaller units in the 500-600kW output power bracket.' 5. In relation to 'Not Acceptable' areas the submission suggests that there should be recognition in the policy that any area which was, or will be, subjected to a long and onerous struggle with wind farm developers and has seen ultimate rejection of those proposals by An Bord Plenala should automatically be seen as unsuitable for wind farming in any future application by virtue of that local opposition. 6. Refers to the Section 28 Statement in Appendix 2 and queries how the Planning Authority can be 'of the opinion' that the Draft Plan will not conform to the section of the WEDG 2006 in relation to set back as the 500m reference in the guidelines was merely an opinion that turbines placed greater than 500m were unlikely to be a noise nuisance. States that the ten times tip height will always be greater than 500m. 7. States that flooding should be noted as a constraint on wind farm developments and refers to recent flooding events in Inishowen and recent cases in Sligo, Galway and Roscommon. 8. In relation to tourism, the submission states that the Plan provides generic headings which are not sufficient and requests a focus on key tourism products that are an international draw and therefore makes the following specific suggestions: <ul style="list-style-type: none"> ▪ Insert a new objective in the tourism section so state: 'It is the policy of Council to actively liaise with other statutory bodies and such agencies as will assist Council in sourcing funding to enable key products as identified in this Plan.' ▪ Provides a narrative on the Fintown Railway experience and suggest that this is a potential 'must-do' experience and therefore requests insertion of a new policy to state: 'To facilitate further development of the Fintown Railway as a Signature 'Must Do' Experience'. ▪ Refers to the ongoing work in relation to the development of the Brian Friel Centre and suggests that the plan should contain a short list of signature developments and the Brian Friel Centre should be added to that list so as to help to accelerate the project. 	

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ Amend the tourism map (Map 9.1) to show the Fintown Railway and Glenties under 'heritage places and buildings.' 	
P101		Martin Gordon	<ol style="list-style-type: none"> 1. The submission outlines satisfaction that Dunwiley Woods in Ballybofey-Stranorlar has been designated as an 'Amenity Area.' There is no map accompanying the submission. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P102		John Kalf	<ol style="list-style-type: none"> 1. In relation to Chapter 2, Core Strategy, the submission makes a number of comments. 2. Refers to the commentary on page 90 which sets out the 5 pillars of the Governments Strategy entitled, 'Rebuilding Ireland, an Action Plan for Housing and Homelessness', published July 2016 the submission comments specifically on Pillar 3 (build more homes) that it is better to build less homes and if possible older people insist to be in their own home with home care and also specifically on Pillar 4 (improve the rental sector) that this is quite late. <ul style="list-style-type: none"> ▪ States that the North West could be halted due to Brexit. ▪ States that a number of points in the transportation strategy will be difficult to achieve out due to Brexit. 3. In relation to Chapter 4, Economic Development, the submission makes a number of comments: <ul style="list-style-type: none"> ▪ States that the organic food area as well as seaweed harvesting and processing has economic potential. ▪ Refers to the takeover of the seaweed processing factory Arramara by a Canadian Company and the potential consequence to the indigenous seaweed industry. It also questions the governments licensing of a Canadian company and refers to an EU-Canada Comprehensive and Economic Trade Treaty. ▪ Specifically in relation to the retail strategy, the submission suggests there should be more markets held on open spaces or in a covered building. 4. In relation to chapter 5, Infrastructure, the submission makes a number of points as follows: <ul style="list-style-type: none"> ▪ Notes T-P-34 (that large scale developments shall provide walking and cycling infrastructure) and proposes that the old Donegal railway track should be used for cycling and the route should be expanded from a local route to a regional cycle network connecting to a countywide network. ▪ Refers to broadband and the barriers to delivery in Inishowen as no supplier is interested in the area. Welcomes that the Plan references the facilitation of a high standard telecommunications network. 	<ol style="list-style-type: none"> 1-3. Comments noted. 4. Refer to themed response on Infrastructure contained in section 3.3 of this report. 5. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report. 6. Refer to themed response on renewable energy contained in section 3.7 of this report. 7. Noted. 8. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report. 9. Noted.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>5. In relation to chapter 7, the Natural and Built Heritage, the submission welcomes the plan as regards its content on trees, stone walls and hedgerows and suggests hedgerows and field boundaries should be monitored in order to protect them.</p> <p>6. In relation to chapter 8, Natural Resources, the submission makes a number of points:</p> <ul style="list-style-type: none"> ▪ Welcomes the content of the plan as regards ocean energy and suggests that the 'Blue Energy' is a much better choice than wind energy. ▪ Welcomes the introduction of the ten times tip height separation distance of turbines to homes and states that County Donegal has enough wind turbines and we should focus on other sources to generate clean energy. Also suggests that wind farms provide only limited employment. <p>7. In relation to Chapter 9, Tourism, the submission welcomes the content of the plan.</p> <p>8. In relation to Chapter 10, The marine resource and Coastal Management, the submission makes a number of points:</p> <ul style="list-style-type: none"> ▪ Queries how far the EU will allow the sustainable growth of our fishing industry, increasing or engagement with the sea for economic recovery. Refers to the EU entrance talks and exchange of fishing grounds. ▪ That marine leisure infrastructure could be expanded for tourism. <p>9. Regarding the Natura Impact Report, the submission states:</p> <ul style="list-style-type: none"> ▪ That human activity can have impacts on the environment such as construction, concrete, road widening as interventions can block the natural flow of drainage waters. ▪ That the reference to a coastline of 1.2km is incorrect. The submission appears to state that in lieu, the coastline is c. 1,134km. 	
P103		Invalid entry in table	N/A	N/A
P104	Conall Newman, Harley Newman Planning Consultants on behalf of PJ McDermott Group	Conal Newman	<p>1. Requests lands at Castlebane, Letterkenny be rezoned from 'Strategic Residential Reserve' (SRR) to 'Primary Residential Phase 1' and provides the following supporting information:</p> <ul style="list-style-type: none"> ▪ Notes that the lands had been zoned for residential use in the previous Letterkenny Plan 2009- 2015 and were changed through variation no 2 (2013). States that the lands therefore occupy a location that was already deemed appropriate for housing. ▪ The development of the lands would make best use of existing services (roads and gravity sewer) and would deliver sequential growth. ▪ Previous planning permission had been granted (ref 07/40750) for 50 dwellings. ▪ The lands are strategically located to make immediate provision for much needed housing. 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ The submission refers to the shortfall in zoned lands for Primarily Residential-Phase 1 of 800 units and states that the LAP process will lead to delay in addressing the urgent housing needs in the town. ▪ States that lands currently zoned 'Primarily residential' do not provide a proper spatial balance but rather are an over concentration of lands in the north-west of the town. States this is contrary to the principles of balanced spatial sequential growth and it stymies growth in the real economy, stagnates the construction sector and can damage the housing market. ▪ States that this is evidenced having regard to virtually no new housing stock being added to the town in the life of the previous plan. ▪ The lands would represent a relatively minor extension (c. 15 acres) of existing mature housing. ▪ Highlights improved accessibility at Kilty roundabout, proximity to new Educate Together School, proximity to existing employment areas and availability of town centre services and amenities. ▪ Lands could provide for in excess of 100 houses. 	
P105	Conall Newman, Harley Newman Planning Consultants on behalf of Patsy McGuinness	Conal Newman	<ol style="list-style-type: none"> 1. Requests lands at Roshin, Killybegs be included with the settlement boundary of Killybegs in order to ensure that the existing caravan and motorhome tourism facility is within the boundary and that a marginal extension be permitted also. Submission provides the following information in support: <ul style="list-style-type: none"> ▪ States that the subject lands were within the plan area of the Killybegs LAP 2009- 2014 and zoned for a mixture of 'Motorhome and Touring Caravan Park' and 'Permanent Caravans/ mobile Homes' and were inadvertently removed in the Draft CDP as an oversight on the part of the Planning Authority. ▪ States that there is an existing tourism facility named Killybegs Holiday Park and that it is requested to marginally and logically extend the settlement boundary to allow for planned growth of their established tourism enterprise. ▪ States that the lands are c1km from the town centre and between the road and the shoreline and are not visible from the public road. ▪ States that planning permission was previously granted and implemented for a motorhome and tourism caravan park under ref 09/20393 and 10/20322. ▪ Significant investment has been made in the established tourism facility which has been recently accredited by Failte Ireland. ▪ The expansion of the established facilities will result in increased expenditure and revenue in Killybegs. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P106	Conall Newman, Harley	Conal Newman	<ol style="list-style-type: none"> 1. Requests lands at Magheraclogher, Bunbeg be included within the settlement boundary and provides the following information in support: <ul style="list-style-type: none"> ▪ The lands are centrally located within the town of Bunbeg/Derrybeg and occupy a town 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
	Newman Planning Consultants on behalf of Owen & Kathleen Gillespie		<p>centre position with direct access to Main Street.</p> <ul style="list-style-type: none"> ▪ Permission was previously granted under ref 04/2656 for 5 units (constructed) with communal sewage treatment plant and for widening of public access road. ▪ The submission refers to the promotion of compact urban forms in the Draft CDP and that the subject lands comply with the policies set out in the draft CDP. States that the lands are strategically located connecting Main Street thoroughfare with the business/industrial park to the east. ▪ The land would contribute to consolidation of the settlement of Bunbeg, comply with the sequential policy and create a sense of place. ▪ The land is ideally placed to avail of local services and infrastructure. ▪ States that the western portion of the subject lands are located within the catchment area identified for the waste water treatment system for the town. ▪ The lands are accessible by car and close walking distance to the amenities of the town including recreational amenities. 	of the lands referred to in the submission can be viewed in Appendix B of this report.
P107	Conall Newman, Harley Newman Planning Consultants on behalf of Gineadoir Gaoithe Teoranta	Conal Newman	<ol style="list-style-type: none"> 1. The submission outlines concerns in relation to wording of certain wind energy policies as they would inhibit the ongoing repowering and extension of existing wind farm sites and that this would be harmful to the wind energy sector. The submission outlines in detail the national and regional context for wind energy and states that it is vital that the County's wind energy potential can be fully harnessed. 2. The submission requests that map 8.2.1, (wind energy) be amended so as to either (i) enlarge the proposed 'Acceptable for Augmentation of/improvement to existing windfarms' designation at Cronalaght, Gweedore to allow for appropriate repowering of the older 8 turbine windfarm or to identify the area at Cronalaght, Gweedore as 'open to consideration.' The submission provides the following information in support: <ul style="list-style-type: none"> ▪ Outlines that E-P-16, E-P-12 and map 8.2.1 would lead to problematic implications for existing windfarms and states careful consideration is required around the practical implications and implementation of such policies in order to properly achieve the result intended. ▪ Specifically in relation to the Cronalaght site states that the existing 8 turbines are old and coming to the end of their useful lifespan. States that the replacement of the existing turbines with 8 new improved turbines could not be accommodated within the confines of the original site due to the need for separation distances of 450m and this area would extend beyond the area for 'Augmentation/ Improvement to existing Windfarms.' States that only 3 of the replacement turbines could be accommodated in the area designated for augmentation with a further 5 turbines outside this and located in an area of 'Not Acceptable'. Submission states that this scenario would be contrary to the intention of repowering policy and be counter-productive, inefficient and unsustainable. ▪ States that the underlying infrastructure should not be underutilised. 	1-5. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ Suggests that there should be flexibility in 'augmentation areas' to allow for the same number of turbines that had been permitted and installed. 3. Submission requests that map 8.2.1 be further amended to re-designate other lands from 'Not Acceptable' to 'Open to Consideration' in order to allow for extension of the permitted windfarm and the provision of 2 additional turbines for reason that this area is a natural extension of the existing windfarm in the context of the natural topography of the landscape surrounding the Cronalaght Windfarm. 4. States that the central tenet of the planning system is the assessment of planning applications on individual merit including EIA and AA and this provides the appropriate arbitration mechanism. 5. Also requests that in the context of the re-designation requests that are outlined at points 2 and 3, the corresponding landscape designations should also be amended. 	
P108	Conall Newman, Harley Newman Planning Consultants on behalf of The Altnapaste Landowners Committee	Conal Newman	<ol style="list-style-type: none"> 1. The submission requests that lands at Altnapaste, Ballybofey be designated as 'Open for Consideration' (Figure 1.4 in appendix 4 of the submission refers) for wind energy and that the landscape classification for the subject lands be designated as a combination of 'Moderate Scenic Amenity' and 'High Scenic Amenity' (figure 1.3 in appendix 3 of the submission refer) The submission sets out the following additional supporting information: <ul style="list-style-type: none"> ▪ The lands partially include and adjoin an area 'open to consideration' in the Draft CDP for wind energy and the re-designation is in the interests of achieving climate change targets, realising wind energy potential and delivering sustainable development. ▪ The submission outlines in detail the national and regional context for wind energy and states that it is vital that the County's wind energy potential can be fully harnessed. ▪ The submission provides an appraisal of the landscape and visual context of the subject lands describing the lands as an upland area comprising mainly coniferous forestry, upland blanket bog and grass and scrubland and states the lands are adequately framed and of distinct contrast to the surrounding landscape. Describes in detail the visual assessment outlining there are restricted views of the subject areas due to topography. States that the landscape features of the subject lands are not sufficient to be classified as 'sublime' EHSA. ▪ The submission provides a synopsis of the two LCA's which cover the area and notes a relationship between the 3 designations on map 8.2.1 to landscape classification and to the LCA. States that the Draft Plan does not set out the evidential approach used to classify the county nor what criteria were used and questions the inter-changeability between the concepts of landscape value and landscape sensitivity. The submission questions the methodology employed in the designation of EHSA and states that the rationale is devoid of explanation. ▪ Refers to the change in landscape classification of the subject lands from the current CDP to the Draft CDP which now identifies the subject lands as partially EHSA, HSA and MSA and notes the significant implications for the future potential use of the lands as a 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>result of the extension of the EHSA.</p> <ul style="list-style-type: none"> ▪ States that the lands display the key characteristics to successfully assimilate potential wind energy developments into the landscape including location, spatial extent, spacing and layout and height. ▪ States that in any case, a fundamental principle of the planning system is the assessment of planning applications on individual merit including EIA and AA. ▪ Attaches an ecological appraisal of the subject lands which outlines that the lands do not include or border any SAC or SPA and it therefore concludes that the re-zoning would not directly impact negatively on any Natura 2000 sites. 	
P109	Conall Newman, Harley Newman Planning Consultants on behalf of Ampco Builders Co Ltd	Conal Newman	<ol style="list-style-type: none"> 1. Request that lands at Drumroosk, Donegal Town be zoned as 'Residential' and provides the following supporting information: <ul style="list-style-type: none"> ▪ Lands are located within the town boundary settlement envelop of Donegal town. ▪ The lands were the subject of an application for permission in 2008 under 08/20418 for mixed use. ▪ States that there is a shortfall of 14hectares of zoned land in Donegal town for residential development and that the proposed rezoning at this stage would provide for the orderly and sequential zoning of residential lands to meet immediate need. ▪ Notes the intention to address the deficit with a Local Area Plan but states that the LAP preparation process will inevitably lead to a serious delay in addressing the urgent housing needs in the town. ▪ States that the requested zoning would not prejudice the LAP and that the subject lands equate to only 10% of the shortfall. ▪ States the lands are suitable due to the strategic location and fully serviced ready to go status. ▪ States the rezoning would facilitate achievement of the proper spatial balance of housing throughout the town. ▪ States the lands would result in a relatively minor extension of existing housing estates in the area. ▪ States the town centre is within easy walking distance and there are shopping facilities, services, employment and leisure and amenity facilities nearby that are readily accessible. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P110	Carr Architects on behalf of Martin Houstonand Alec O'Donnell	Tony Carr	<ol style="list-style-type: none"> 1. Submission requests that lands at Ballyraine, Letterkenny be zoned for 'General Employment' or any other zoning that would enhance the future development of the lands as a high profile business park. 2. Also requests the inclusion of proposed access routes through the lands from Ballyraine roundabout to the proposed N56 Letterkenny Relief Road. 3. Outlines that it is the intention of the landowner to develop a 'Business Park' possibly in conjunction with IDA. 	<ol style="list-style-type: none"> 1-3. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P111	Carr Architects on behalf of Ms. Anne Corbett	Tony Carr	<ol style="list-style-type: none"> Submission requests that lands at Magheracar, Bundoran be zoned for 'Residential Phase 1' for the following reasons <ul style="list-style-type: none"> Proximity of 1.2k to town centre Location in suburban settlement Previously zoned and granted permission for 6 units (05/10054 and 11/10018) 	<ol style="list-style-type: none"> Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P112		Mary Crumlish	<ol style="list-style-type: none"> The submission supports the 10 times tip height separation distance in relation to wind energy to protect rural populations from industrial wind farms. It also states that areas identified as 'Not Acceptable' should not be considered for wind energy development. Refers to the promotion and importance of tourism and the WAW and that in this regard we should be protecting and enhancing heritage, culture and the rugged nature of our county. States that wind farms are intrusive on the landscape. States there should be a distance of 5km between the WAW/ coastline and turbines. States that at present it is 700m from these routes. States the Council should continue to support, sustain and enhance the Greencastle to Magilligan ferry and the Rathmullan to Buncrana ferry services. Outlines the importance of protecting EHSA's from intrusive and unsympathetic development. States that the Council should continue policy on safeguarding coastlines, skylines and ridgelines from inappropriate development. 	<ol style="list-style-type: none"> 1-2. Refer to themed response on renewable energy contained in section 3.7 of this report. 3. Refer to themed response on Infrastructure contained in section 3.3 of this report. 4. Noted. Policy NH-P-6 of the Draft Plan specifically provides protection for areas designated EHSA. 5. Noted. Policy NH-P-15 specifically addresses this issue.
P113		Eileen Hynes	<ol style="list-style-type: none"> Submission outlines concerns regarding wind energy development making the following specific points: <ul style="list-style-type: none"> Concerned about the impacts of turbines on the countryside, animals and human beings. Refers to reports of people felling unwell in Cork due to vibration from turbines. States that height of turbines are ridiculous and not in keeping with local topography. Specifically requests that the townlands of Belalt, Owennagadragh, Ballyarrell Mountain or Cornashesk, Corradoeey, Corlea, Cronalaghy, Lissmullyduff, Meenagolan, Meenreagh, Gortahork (ED Gleneely), Carn, Corraffrin, Kinletter, Tievecolhoge, Trusk, Taughboy, Meenbog and Croaghonogh be designated as unsuitable for wind farm development. States that the hills are already contributing to a reduction in CO2 gas. States that Donegal seems to have a very high proportion of wind farms. 	<ol style="list-style-type: none"> Refer to themed response on renewable energy contained in section 3.7 of this report.
P114		Veronica Shiels	<ol style="list-style-type: none"> The submission states that the writers daughter was forced to emigrate as she was unable to get planning permission their own land, 5km from Letterkenny and this is 'killing off rural Donegal.' 	<ol style="list-style-type: none"> Comments noted.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P115		Edward Mc Fadden	<ol style="list-style-type: none"> The submission requests that the designation of lands described as 'Ait an tsean ti', Gweedore be amended from 'Not acceptable' to 'Open to Consideration' for wind energy and provides the following supporting information: <ul style="list-style-type: none"> There has been a decline in employment sectors in recent years and the potential for wind generated electricity would be a healthy source of income, strengthen the community and reduce emigration. The construction and maintenance of wind farms also provides employment and economic benefit. 	<ol style="list-style-type: none"> Refer to themed response on renewable energy contained in section 3.7 of this report.
P116		Joe Bovaird, Patrick Boyce, PM (Surname not legible), Dr. Daniel McGinley, Cllr Martin Farren	<ol style="list-style-type: none"> The submission relates to Moville Pier and requests that public amenity/open access status be granted to Moville Pier and that the acknowledged Right of Way from Bath Green to Moville Pier be maintained and not obstructed. The submission refers to An Bord Pleanala direction ref 247494 which adjudicated on a planning appeal giving precedence to public amenity and open access at this location. 	<ol style="list-style-type: none"> Refer to themed response on tourism contained in section 3.8 of this report.
P117		Danny Mc Dermott	<ol style="list-style-type: none"> The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. The coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	<ol style="list-style-type: none"> 1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P118		James Ball	<ol style="list-style-type: none"> The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal 	<ol style="list-style-type: none"> 1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

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			<p>zone without consideration of wilderness and the presence or absence of manmade structures.</p> <p>4. Outline concern that such blanket designation will restrict economic development in rural coastal locations.</p>	
P119		Des Moore	<p>1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed.</p> <p>2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition.</p> <p>3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures.</p> <p>4. Outline concern that such blanket designation will restrict economic development in rural coastal locations.</p>	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P120		Hugh Wilhare	<p>1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed.</p> <p>2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition.</p> <p>3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures.</p> <p>4. Outline concern that such blanket designation will restrict economic development in rural coastal locations.</p>	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P121		John Boyle	<p>1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed.</p> <p>2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its</p>	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

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			<p>current level of development. Disagrees that the coastline falls within the EHSA definition.</p> <ol style="list-style-type: none"> 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	
P122		Michael McLaughlin	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P123		Michael Barr	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P124		Philip Doherty	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

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			<ol style="list-style-type: none"> 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	
P125		James Bonnar	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P126	McIllwaine Shellfish		<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P127		Edward Gallagher	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not 	1 to 4. Refer to themed response on the marine resource and coastal management contained in

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			<p>supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed.</p> <ol style="list-style-type: none"> 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	section 3.9 of this report.
P128		Martin Coll	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P129		John Duffy	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

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P130		Anthony Duffy	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P131		Conor Reid	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P132		Damian Reid	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			coastal locations.	
P133		James Doherty	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P134		Charlie Doherty	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P135		Derek Diver	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

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			<p>structures.</p> <p>4. Outline concern that such blanket designation will restrict economic development in rural coastal locations.</p>	
P136		Conor Blake	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P137		Michael Halvin	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P138		Jerry Gallagher	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

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			<ol style="list-style-type: none"> 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	
P139		John McKinney	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P140		Alan Mc Glinchey	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P141		Paul Mc Cruden	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

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			<p>that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition.</p> <ol style="list-style-type: none"> 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	
P142		Stephen Kearney	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P143		Paul Mc Hugh	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P144		Charlie McHugh	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be 	1 to 4. Refer to themed response on the marine resource and coastal management contained in

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			<p>urgently reviewed.</p> <ol style="list-style-type: none"> The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	section 3.9 of this report.
P145		Patrick Mc Daid	<ol style="list-style-type: none"> The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P146		Tiernan Mc Daid	<ol style="list-style-type: none"> The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P147		Shaun Mc Daid	<ol style="list-style-type: none"> The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting 	1 to 4. Refer to themed response on the marine resource and coastal management contained in

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed.</p> <ol style="list-style-type: none"> 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	section 3.9 of this report.
P148		John Boyle	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P149	Ostrea Teo	Ostrea Teo	<ol style="list-style-type: none"> 1. The submission relates to aquaculture and outlines disappointment with the Draft CDP in relation to the treatment of the aquaculture industry. The submission states that fleeting reference is made to aquaculture but primary production of aquaculture products is not supported by any objectives/policies in Ch 4 or Ch 10. The submission requests that this be urgently reviewed. 2. The submission raises concerns in relation to expansion of EHSA along the coast and states that it has been proposed without due consideration of the nature of the coastline and its current level of development. Disagrees that the coastline falls within the EHSA definition. 3. Considers the coastal extension of EHSA's appear to be a blanket classification of the coastal zone without consideration of wilderness and the presence or absence of manmade structures. 4. Outline concern that such blanket designation will restrict economic development in rural coastal locations. 	1 to 4. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P150		Michael Scott	<p>1. Submission requests re-zoning of lands at Kiltoty, Letterkenny from 'General Employment' to 'Primary Residential' for the following reasons;</p> <ul style="list-style-type: none"> ▪ Sufficient infrastructural capacity in close proximity to Kiltoty Junction with recently upgraded roads and with adequate water/wastewater and services ▪ The lands would be able to support multiple and larger scale housing developments ▪ Provides an opportunity to address development demands ▪ The lands are greenfield. ▪ The site is sequential and outwards and permits use of existing infrastructure ▪ Easy integration with New Educate together school ▪ Lands provide sustainable development and fulfil the evidenced based approach ▪ The land would assist to address the shortfall of residential units in Draft CDP in table 2.6 ▪ Proximity to town centre, schools, shops and places of worship. 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P151		Michael Scott	<p>1. Submission requests lands at Windyhall, Letterkenny be zoned as 'Strategic Residential Reserve' for the following reasons;</p> <ul style="list-style-type: none"> ▪ Notes that part of the lands are already zoned SRR ▪ The proposed infrastructural future upgrades including a strategic road corridor pass close to the lands and the new outer ring road will support necessary upgrades. ▪ The land will be able to support multiple and larger scale developments ▪ Offers an opportunity to address current and future demand by means of a 'Landbank' ▪ The lands are currently Greenfield ▪ The lands offer a sequential outwards manner development pattern and makes efficient and effective use of infrastructure ▪ Lands adjacent are SRR and rezoning would ensure development of backlands would not be jeopardised. ▪ Lands would provide sustainable development and fulfil evidence based approach ▪ The lands would address the shortfall of residential units in Draft CDP in table 2.6 ▪ The lands are located in proximity to town centre, schools shops, places of worship and the hospital. 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P152		Michael Scott	<p>1. Submission requests inclusion of lands at Newmill, Ramelton within the Settlement Envelope of Ramelton Town for the following reasons;</p> <ul style="list-style-type: none"> ▪ Opportunity to provide serviced sites within short distance of town centre ▪ Provide small scale residential development incl. social housing ▪ Adequate Infrastructural capacity in terms of water/wastewater and electricity ▪ Opportunity to address current and future demand for houses ▪ The lands are currently a greenfield site ▪ The lands offer a sequential outwards development pattern and make efficient and effective use of infrastructure. 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

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			<ul style="list-style-type: none"> ▪ Location is within walking distance from town centre, schools, shops and churches. 	
P153	Element Power Ireland Limited	Kevin O' Donovan	<ol style="list-style-type: none"> 1. The submission relates to wind energy and outlines concern regarding the negative approach in the Draft CDP, stating it is in disagreement with the existing Wind Energy Development Guidelines 2006 and the 'draft preferred approach,' June 2017. A copy of the 'draft preferred approach' and previous Ministerial Direction accompanies the submission. The submission outlines in detail EU and National energy commitments, climate change policy and targets and progress towards targets, security of energy supply, competitiveness of wind energy and local benefits. 2. The submission objects to E-O-6 which references text in relation to setback distances and requests deletion of section 6.5(f) and any other reference to set back of ten times tip height for the following reasons: <ul style="list-style-type: none"> ▪ E-O-6 and section 6.5(f) runs contrary E-O-5 and E-P-10 and is not in compliance with national policy; ▪ The proposed approach is without credible scientific evidence base. ▪ States that references to specific incidents of blade throw, turbine collapse well as two noise reports as forming part of the evidence base does not constitute scientific evidence to justify the proposed setback. ▪ States that the Environmental Report does not provide the necessary information in relation to E-O-6. 3. Requests that map 8.2.1 is removed and that a new process should be commenced where scientific evidence is clearly used to justify the proposals and specifically makes the following comments: . <ul style="list-style-type: none"> ▪ States that a negative approach has been taken in order to preclude future Greenfield development; ▪ State that the approach dates back to Variation no 2 which was proposed without merit and was not in compliance with national policy. ▪ Notes that the text in relation to the evidence base is not significantly at variance with the same text in the existing CDP and therefore it is unclear how a vastly different wind energy map can be arrived at. ▪ State that it is possible to undertake FWPM surveys and assessment and to design mitigation measures to protect the species. ▪ States that the blanket ban on individual species designation is not recommended by NPWS and is contrary to specific EU Commission advice on the implementation of Natura 2000 Regulations. ▪ State that on analysis, as a result of the Draft CDP, only 1.5% of the County remains 'open to consideration.' ▪ States that not all wind farms that have been granted permission have been marked as areas 'For Augmentation' on map 8.2.1. Also queries whether there is sufficient room for extensions provided. 	1-4. Refer to themed response on renewable energy contained in section 3.7 of this report.

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			4. States that E-P-12(b) is restrictive as it limits extensions of up to 20%. States that wind farm extensions should be permitted to maximise the use of their grid infrastructure.	
P154	Mantis Cranes (Ireland) Ltd	Seamus Mc Menamin	<ol style="list-style-type: none"> 1. Submission describes the lack of dedicated or serviced lands in Ballybofey/Stranorlar area should a workshop or factory wish to set up and states that this stagnates existing businesses wishing to expand and those seeking to relocate or set up within the region and it also stagnates growth and potential employment. States that this is critical for small businesses. 2. States that availability of incubator/start up units is critical for small business. 3. States that location and access is crucial and notes the issues in obtaining access to national primary routes. Considers this as discouraging for business. 4. Describes lands at Corcam on main Stranorlar to Killygordon road as currently available but notes that it has not be possible to obtain planning permission. No map accompanies the submission. States that the lands are ideally located for transport connections. Requests that, regardless of the suitability or otherwise of Corcam lands, the Council should address this issue and help make available affordable serviced lands to encourage industrial development. 	<p>1, 2 & 4. The submission makes the case for, and requests the zoning of lands in Stranorlar. The County Development Plan is strategic in nature. The core strategic requirement of the Plan in terms of housing land supply is to allocate appropriate proportions of the overall identified housing land requirement for the County across the identified Settlement Structure layers. The assessment of any specific proposals to amend the zoning of particular sites should only be made in the context of a detailed and comprehensive assessment of the overall land supply and zoning situation in Letterkenny and each of the Layer 2A Strategic Towns. The most appropriate vehicle for these detailed assessments is through the preparation of Local Area Plans (LAPs) and the Council is committed to a programme for the preparation of such LAPs for Letterkenny and the Layer 2A settlements in the County (Buncrana, Ballybofey/Stranorlar, Donegal Town, Carndonagh, Ballyshannon, Bundoran, Killybegs, An Clochan Liath (Dungloe).</p> <p>3. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p>
P155		Mary Carey	<ol style="list-style-type: none"> 1. Submission relates to lands at St. Orans Park, Buncrana and requests that the 'Amenity/Recreation' zoning in the Draft CDP is retained. The submission refers to the associated policy provisions and that the zoning should be retained for the following reasons: 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ As a riverbank walkway, the land represents a significant amenity area in the town. ▪ States such areas are scarce and it is much used and needs to be protected. ▪ The site provides a natural water attenuation feature and needs to be retained. 	submission can be viewed in Appendix B of this report.
P156		Lauence Doherty	1. The submission requests extension of town boundary at Mountcharles in order to ensure the writers children have a place to live in the future as it is becoming increasingly difficult to obtain planning permission.	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P157		Derek & Roisin Mc Laughlin	<ol style="list-style-type: none"> 1. The submission requests extension of town boundary at Carndonagh to be considered for development and future provision of services for the town. (No Map accompanies the submission). 2. The submission states that planning permission existed under 08/70403. 	1-2. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P158		Seamus Rodgers	<ol style="list-style-type: none"> 1. The submission makes suggestions in relation to housing that social housing should be promoted in rural areas to kick-start regeneration and small housing schemes promoted in towns and villages as well as 'living over the shop' encouraged. It also suggests that Council compulsorily acquire derelict properties for housing. 2. States that planning permission must be refused for housing on floodplains. 3. Makes suggestions in relation to heritage and wildlife to protect significant sites and prioritise coastal zone management, the coastline and off shore islands. 4. Suggest that the Council work with the Department of Communications to roll out broadband especially to rural areas 5. In relation to the Gaeltacht, requests that special recognition be given to Gaeltacht areas and that working with Údarás na Gaeltachta, effort be made to create employment and promote the language. 6. A number of other areas are addressed in the submission including: <ul style="list-style-type: none"> ▪ Implementation and enforcement matters to ensure compliance with conditions. ▪ Processes for Procurement and contracts on public works construction sites around social clauses, transparency of procurement, employment terms. ▪ Promote gender balance in naming of new monuments, roads, bridges. ▪ Continue the roll out of the 'better energy homes scheme.' ▪ Work toward the sustainability of the post office network. ▪ Makes suggestions to enhance democracy ▪ Schools and colleges to be a part of the arts and culture programme of the County Council. 	<ol style="list-style-type: none"> 1. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 2. Refer to themed response on flood risk contained in section 3.4 of this report. 3. Refer to themed response on natural and built heritage contained in section 3.6 of this report and to the themed response on the marine resource and coastal management contained in section 3.9. 4. Refer to themed response on Infrastructure contained in section 3.3 of this report. 5. Refer to themed response on community, culture and the Gaeltacht contained in section 3.10 of this report. 6. Comments noted – however, the matters raised are outside the remit of the Draft CDP.
P159	Harley	Jim Harley	1. Submission requests lands at Creeve (Smith), Letterkenny be rezoned from 'Strategic	1. Refer to themed response on site

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	Planning Consultants Ltd on behalf of Longmarsh Developments Ltd.		<p>Residential Reserve' to 'Residential Phase 1' and provides the following information:</p> <ul style="list-style-type: none"> ▪ Subject lands are 1km south west of Letterkenny Town Centre and from a sequential viewpoint are as close as most of lands zoned 'Residential Phase 1' in current plan. ▪ Planning permission was granted by Donegal County Council ref 06/80149 (174units), and 12/80073(EOD until December 2017). The submission states that works have commenced and substantial works will be completed before expiration. ▪ Provides a narrative on the Core Strategy in the Draft CDP in general, and the approach to Letterkenny as the layer 1 settlement. Notes that the Draft CDP identifies a requirement of 70Ha of residential lands in Letterkenny and that there is a shortfall of 839 units. ▪ Notes that lands in Creeve zoned Residential Phase 1 immediately to the north of the subject lands have been developed and it would be reasonable to zone these lands as Established Development and the subject lands as Residential Phase 1. ▪ The lands benefit from the availability of a gravity connection to the foul sewer, gravity storm water outlet, new mains water supply, improved footpath and road network and all utility services. ▪ The lands meet all the criteria for selection of residential phase 1 and the zoning of lands would facilitate significant planning gain through creation of an improved junction and road width. ▪ States that 'Residential Phase 1' zoning in the last and current plan have failed to deliver. ▪ The rezoning will facilitate the much needed supply of high quality housing. ▪ In the absence of the proposed rezoning request, there will effectively be no land zoned residential south of the River Swilly. 	<p>specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P160		Edel Doherty	<p>1. Submission requests that the ten times tip height set back in relation to windfarms is retained and that the Cashelnavern and Finn Valley LCA's are zoned unacceptable for wind farm development for the following reasons:</p> <ul style="list-style-type: none"> ▪ The areas are of great ecological importance. ▪ The extent of natura 2000 sites including Croaghonagh Bog, and NHA's and pNHA's. ▪ Impact on landscape and visual amenity ▪ Impact of shadow flicker. ▪ Impact of noise within a low noise environment. Notes national guidelines could permit up to 43db and states that this would be unacceptable in the low noise environment. ▪ Potential to result in property devaluation 	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P161		John Doherty	<p>1. Submission requests that the ten times tip height set back in relation to windfarms is retained and that the Cashelnavern and Finn Valley LCA's are zoned unacceptable for wind farm development for the following reasons:</p>	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the</p>

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			<ul style="list-style-type: none"> ▪ The areas are of great ecological importance. ▪ The extent of natura 2000 sites including Croaghonagh Bog, and NHA's and pNHA's. ▪ Impact on landscape and visual amenity ▪ Impact of shadow flicker. ▪ Impact of noise within a low noise environment. Notes national guidelines could permit up to 43db and states that this would be unacceptable in the low noise environment. ▪ Potential to result in property devaluation 	lands referred to in the submission can be viewed in Appendix B of this report.
P162		Bernard Deehan Harry Deehan Donal Walker Kevin Mc Laughlin Michael McLaughlin	<ol style="list-style-type: none"> 1. The submission relates to lands at Monreagh and Garvary and requests that the lands be identified as 'open to consideration' for wind energy development due to the exceptional wind speeds, proximity to Trillick substation, that the site is not within NPWS designated areas and the infrastructure for a windfarm is in place as well as a 5m wide roadway to the summit of the mountain. 2. The submission notes the landscape sensitivity and acknowledges that turbines may not be suitable on the summit but request reconsideration of the designation for the site. 	1- 2. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P163		Brendan Gallagher	<ol style="list-style-type: none"> 1. Submission welcomes the set back distance of turbines to residential properties and other centres of human habitation of ten times tip height and requests that it is carried on into the new CDP. 2. Notes recent circulars and states that relevant ministers continue to have the interests of large wind developers at heart and fail to address the problems associated with wind turbines. 3. States that the set back of 4 times tip height in recent circular and guidelines is no better than current guidelines which the relevant minister stated were not fit for purpose. 4. States that the suggested noise levels of maximum 43Dba in the guidelines are not in keeping with international standards and The World Health Organisation which recommends a maximum of 40Dba. Notes that rural areas are low noise environments and that good practice would suggest levels do not surpass 5Dba above background noise. States that 40 to 43Dba would grossly exceed 5Dba above background noise in most rural areas. 5. Submission refers to recent National Scale Acoustic Model for wind farm noise in Ireland carried out by RPS which found that a setback of 1200 m would be required to achieve 40Dba. 6. Suggest that the set back provided for in the new guidelines will not address shadow flicker and that to do so, turbine manufacturers recommend siting turbines ten times rotor diameter from affected properties which would be more than four times tip height. 7. State that the new guidelines suggest that to address shadow flicker and noise, technology can be used to control and restrict turbine operation. Contends that this is counterproductive, irresponsible development, is not environmentally friendly and does not make economic sense. 	1. Refer to themed response on renewable energy contained in section 3.7 of this report.

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			<p>8. Refers to the Carrickaduff wind farm that was refused permission and states that no home should be encircled by turbines regardless of the set back.</p> <p>9. Requests that LCA 40 (Cashelnavern Border and Uplands) and LCA 14 (Finn Valley) should remain as areas unacceptable to wind farm development due to their ecological importance, the potential impact on visual amenity and potential property devaluation.</p> <p>10. Requests that Cashelnavern be identified as an area of 'Especially High Scenic Amenity.'</p>	
P164		Robert Wasson	<p>1. Outlines concerns in relation to the process for consultation including local availability of hard copies of the draft plan, cost to purchase and length of the document. States that a series of local meetings with Council representatives might have stimulated more genuine interest.</p> <p>2. Refers to the model of representation adopted for the PPN and the Community Network stating it is not working and suggests that the Development Plan needs to review and address the Network representation.</p> <p>3. States that there is an unfortunate emphasis on the NW City Region at the expense of rural areas particularly the 'Northern Margins'. Refers to the settlement hierarchy stating that it pays least attention to rural areas and starts with Letterkenny. Also suggest there is an argument for putting some border projects on hold and redirecting attention to the northern margins until there is greater clarity of the border region. Notes census data showing large numbers of holiday home and states that holiday homes make little contribution to local areas.</p> <p>4. States that there should be a sensitive approach to tourism expansion, signage and access for some scenic roads and locations so that the special environments of the county are protected and safeguarded. Also states that a 'gentle approach' is needed in relation to provision of footpaths and street lighting in rural area as it is important to safeguard 'dark skies.'</p> <p>5. Outlines the problems associated with service provision for campervans and states that other countries provide park and pay serviced sites.</p> <p>6. States that ingress of road verges should be maintained as it reduces road width and car parking opportunities and that maintenance will cost less than provision of alternative car parking areas.</p> <p>7. Outlines concern for loss of important built heritage and concern that some heritage buildings are not identified by NIAH and not protected.</p> <p>8. States that the Draft Plan is lacking in relation to community development given the range of groups in the county and that there is a need to create an inventory and monitor activities.</p>	<p>1. The Council has held numerous consultation events in respect of the Draft CDP, inclusive of 6 'drop-in' events across the various Municipal District. A consultation period inviting writing submissions on the Draft Plan was advertised throughout the County via local newspapers and on an ongoing basis through the council's website, blog, Facebook page and twitter account.</p> <p>2. This matter is not within the remit of the CDP.</p> <p>3. The Draft Plan notes the importance of the Northwest City Region initiative but also stresses the significant capacity throughout the entire County to participate in and contribute to growth and development. Whilst the Plan provides for a clear settlement hierarchy in terms of urban structure, it also offers significant opportunity for appropriate development proposals throughout all towns, villages and rural areas in the County. Comments in relation to uncertainties surrounding the border area are noted and reference is made to these uncertainties in the text of the Plan. The limited/short-term contribution of holiday development to local economies is also acknowledged in the Plan.</p> <p>4. Refer to themed response on natural and built heritage and the environment</p>

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				<p>contained in section 3.6 of this report, which deals with Council policies to protect sensitive environments.</p> <p>5. Refer to themed response on tourism contained in section 3.8 of this report.</p> <p>6. These comments are noted and are considered to be a localised matter rather than a strategic issue for the CDP.</p> <p>7. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.</p> <p>8. Comments noted – however, such matters are considered to be outside the scope of the CDP.</p>
P165		Patricia & Stephen Bradley	<ol style="list-style-type: none"> 1. Requests that the setback distance in relation to wind turbines of 10 times tip height is carried into the development plan in order to protect the Finn Valley area from wind farm development and due to concerns in relation to visual impact, noise/public health concerns, wildlife and habitat and devaluation of property. 2. In relation to noise, the submission notes new proposed guidelines could permit wind turbine noise up to 43DbA and states that this is not acceptable in a low noise area. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P166		Marian Gallagher	<ol style="list-style-type: none"> 1. Submission welcomes the set back distance of turbines to residential properties and other centres of human habitation of ten times tip height and requests that it is carried on into the new CDP. 2. Notes recent circulars and states that relevant ministers continue to have the interests of large wind developers at heart and fail to address the problems associated with wind turbines. 3. States that the set back of 4 times tip height in recent circular and guidelines is no better than current guidelines which the relevant minister stated were not fit for purpose. 4. States that the suggested noise levels of maximum 43DbA in the guidelines are not in keeping with international standards and The World Health Organisation which recommends a maximum of 40DbA. Notes that rural areas are low noise environments and that good practice would suggest levels do not surpass 5DbA above background noise. States that 40 to 43DbA would grossly exceed 5DbA above background noise in most rural areas. 5. Submission refers to recent National Scale Acoustic Model for wind farm noise in Ireland carried out by RPS which found that a setback of 1200 m would be required to achieve 40DbA. 6. Suggest that the set back provided for in the new guidelines will not address shadow flicker and that to do so, turbine manufacturers recommend siting turbines ten times rotor 	<p>1-10. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>diameter from affected properties which would be more than four times tip height.</p> <ol style="list-style-type: none"> 7. State that the new guidelines suggest that to address shadow flicker and noise, technology can be used to control and restrict turbine operation. Contends that this is counterproductive, irresponsible development, is not environmentally friendly and does not make economic sense. 8. Refers to the Carrickaduff wind farm that was refused permission and states that no home should be encircled by turbines regardless of the set back. 9. Requests that LCA 40 (Cashelnavern Border and Uplands) and LCA 14 (Finn Valley) should remain as areas unacceptable to wind farm development due to their ecological importance, the potential impact on visual amenity and potential property devaluation. 10. Requests that Cashelnavern be identified as an area of 'Especially High Scenic Amenity.' 	
P167		Dermot Mc Menamin	<ol style="list-style-type: none"> 1. Submission welcomes the set back distance of turbines to residential properties and other centres of human habitation of ten times tip height and requests that it is carried on into the new CDP. 2. Notes recent circulars and states that relevant ministers continue to have the interests of large wind developers at heart and fail to address the problems associated with wind turbines. 3. States that the set back of 4 times tip height in recent circular and guidelines is no better than current guidelines which the relevant minister stated were not fit for purpose. 4. States that the suggested noise levels of maximum 43DbA in the guidelines are not in keeping with international standards and The World Health Organisation which recommends a maximum of 40DbA. Notes that rural areas are low noise environments and that good practice would suggest levels do not surpass 5DbA above background noise. States that 40 to 43DbA would grossly exceed 5DbA above background noise in most rural areas. 5. Submission refers to recent National Scale Acoustic Model for wind farm noise in Ireland carried out by RPS which found that a setback of 1200 m would be required to achieve 40DbA. 6. Suggest that the set back provided for in the new guidelines will not address shadow flicker and that to do so, turbine manufacturers recommend siting turbines ten times rotor diameter from affected properties which would be more than four times tip height. 7. State that the new guidelines suggest that to address shadow flicker and noise, technology can be used to control and restrict turbine operation. Contends that this is counterproductive, irresponsible development, is not environmentally friendly and does not make economic sense. 8. Refers to the Carrickaduff wind farm that was refused permission and states that no home should be encircled by turbines regardless of the set back. 9. Requests that LCA 40 (Cashelnavern Border and Uplands) and LCA 14 (Finn Valley) should remain as areas unacceptable to wind farm development due to their ecological importance, the potential impact on visual amenity and potential property devaluation. 	1-10. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			10. Requests that Cashelnavern be identified as an area of 'Especially High Scenic Amenity.'	
P168		John Conaghan	1. The submission requests a complete ban on future wind energy development as it threatens wildlife, landscape, quality of life, health and tourism. Submission also suggests review of the Mountaineering Council of Scotland Report published July 2016.	1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P169		Martin Browne	1. The submission states that wind turbines should be located at least 5 miles away from houses and refers to his own experience of living close to large turbines and the associated effects on everyday life and health.	1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P170	The Meenbog Community Group c/o Kirsty Pearson and Aron McGuire	Kirsty Pearson and Aron McGuire	<p>1. Submission details ongoing work in relation to a three-way community-windfarm-forestry partnership that is being developed at Coillte lands located east of Barnesmore Gap. The submission states that the plan is that the potential windfarm provides the economic and infrastructural engine to ensure that the Meenbog Community Group can successfully implement their project which includes (a map and associated illustrations accompany the submission to the concept for the project);</p> <ul style="list-style-type: none"> (i) An amenity park linked to walkways/bikeways using windfarm and forestry access roads; (ii) A bog trail, access to biodiversity with interpretation panels and picnic areas; (iii) Related infrastructure such as car parking, restrooms and potentially Wi-Fi with local access to green energy. <p>2. Outlines that the Draft CDP identifies the area of the project as no longer open for consideration and objects to this amendment as it will block the project. Outlines the elements of merit of the project including that it is a green-energy amenity development, integrates useful amenity for the community and has the potential to reinvigorate the community.</p>	1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P171		Una Tourish	1. The submission relates to wind energy and requests that no more wind farms be considered or if this is not possible, the submission supports the policy providing for 10 times tip height setback.	1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P172		Brendan Patton	<p>1. The submission refers to a wooded area running from Greenhills to Dunwiley, Stranorlar and describes it as an original Irish wood that has been maturing for years and is completely unspoiled. The submission seeks the area to be protected from any development so it remains intact. No map accompanies the submission.</p> <p>2. The submission suggests that Donegal County Council should consider buying the area for a public amenity.</p>	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P173		Geraldine	1. The submission supports the 10 times tip height separation distance in relation to wind	1. Refer to themed response on renewable

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
		Breslin	<p>energy to protect rural populations from industrial wind farms. It also states that areas identified as 'Not Acceptable' should not be considered for wind energy development.</p> <ol style="list-style-type: none"> Refers to the promotion and importance of tourism and the WAW and that in this regard we should be protecting and enhancing heritage, culture and the rugged nature of our county. States that wind farms are intrusive on the landscape. States there should be a distance of 5km between the WAW/ coastline and turbines. States that at present it is 700m from these routes. Outlines the importance of contributing to the ferry services of Magilligan to Greencastle and also the tourism, employment and exposure potential of the Golf tournament in 2018. Outlines the importance of protecting EHSA's from intrusive and unsympathetic development. States that the Council should continue policy on safeguarding coastlines, skylines and ridgelines from inappropriate development. 	<p>energy contained in section 3.7 of this report.</p> <ol style="list-style-type: none"> Refer to themed response on tourism contained in section 3.8 of this report. Refer to themed response on Infrastructure contained in section 3.3 of this report, as it relates to the support for ferry services. Comments in relation to the Irish Open are noted, in terms of the potential for spin-off benefits. Comments noted – the importance of protecting areas designated as being of EHSA is clearly provided for in the CDP, e.g. Policy NH-P-6. Noted. Policies NH-P-15 and NH-P-8 provide specific protections in this regard.
P174		Niall Crossan	<ol style="list-style-type: none"> The submission provides a brief narrative to state that the writer owns 26 acres of land at Knockybrin, Letterkenny and states that their 5 children wish stay local and to build on the land in the future that they would get planning. No map accompanies the submission. 	<ol style="list-style-type: none"> Comments noted. Any application for residential development will be subject to the relevant housing policies and subject to all other relevant planning considerations.
P175		Karl Gallagher and Ursula Crossan	<ol style="list-style-type: none"> The submission provides a brief narrative to state that the writer owns 20 acres of land at Knockybrin, Letterkenny and states that he would hope that if his children wished to build on the land in the future that they would get planning. No map accompanies the submission. 	<ol style="list-style-type: none"> Comments noted. Any application for residential development will be subject to the relevant housing policies and subject to all other relevant planning considerations.
P176		Anne Morrow	<ol style="list-style-type: none"> The submission objects to lands being zoned at Castlebane, Stranorlar as Amenity (No map accompanies the submission). It provides a narrative on previous rezoning from 'Residential 1st phase' to 'Amenity' in 2008 and attaches a newspaper article in that regard. The submission refers to the loss of other lands in their ownership for the bypass and a bridge and questions the necessity for so much amenity lands as well as the purpose of the lands in relation to the golf club. The submission states that the intention is to retain as farm land or in the future to possibly provide a site for some grandchildren. 	<ol style="list-style-type: none"> Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P177		Maeve and Cormac Scully	<ol style="list-style-type: none"> The submission requests that Dunwiley Wood, Stranorlar be retained as a designated green amenity area and that this be stated in future planning documents as the wood is a habitat for plant and animal species including protected species. No map accompanies the submission. 	<ol style="list-style-type: none"> Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in

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				Appendix B of this report.
P178	Kilcar Parish Council	Paul Byrne	<ol style="list-style-type: none"> 1. The submission objects to the "Carrick Development Plan" pointing out that 'part of the plan is taking up part of the Kilcar Parish (Roxborough Glebe).' No map accompanies the submission. 2. Objects to any development on the Kilcar side of Carrick Bridge and further states that the people of Roxborough Glebe have a right to be consulted for any developments in Roxborough Glebe in the future. States that Kilcar Parish Council should be contacted with any further development of Roxborough Glebe. 	<ol style="list-style-type: none"> 1. These comments are noted. However, the mapping contained in the CDP has no bearing on Parish boundaries. 2. Noted – any development proposals in Roxborough Glebe would be subject to assessment in light of all material planning considerations and furthermore, would be subject to advertisement and public comment procedures pursuant to the planning and development legislation.
P179		Patricia McGinty	<ol style="list-style-type: none"> 1. The submission relates to lands at Cloghervaddy Hill/Altnapaste, Ballybofey shown and requests that the designation in relation to wind energy is amended so as to identify the lands as 'Open to Consideration' for the following reasons: <ol style="list-style-type: none"> (i) The land is suitable for wind energy development as it is upland and there is significant forestry in the surrounding area; (ii) There are no occupied houses nearby; (iii) Its inclusion would contribute to the amount of land needed in County Donegal for wind energy potential and; (iv) It would provide a sustainable income for land owners in this rural area. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P180	Derrykillew Community Windfarm	Steven Quinn	<ol style="list-style-type: none"> 1. The submission outlines support for wind energy and details planning permission granted by An Bord Plenala Ref 14/51400 at Derrykillew, Ballyshannon for 5 no. wind turbines describing the project as a community wind farm project (No map submitted). The submission outlines that in the CDP 2012, the area of the site of the project is identified as 'Open to Consideration' but in the Draft CDP, the area is 'Not Acceptable' for Wind Energy. 2. The submission states that the rezoning of the lands as 'Not Acceptable' in the Draft CDP is not based on evidence to warrant the proposed change and the site is not located close to EHSA or a conservation site. States that the site has proximity to grid connection and is of low sensitivity landscape. Notes that EIA, EIS and landscape sensitivity were considered acceptable by An Bord Plenala. It therefore requests that map 8.2.1 be amended so as to: <ol style="list-style-type: none"> (i) Reflect the original map in the existing CDP prior to the introduction of variation no 2 and; (ii) The area around the site of 14/51400 should be identified as and 'Area for Augmentation' and; (iii) The area for 5km around the permitted wind farm (14/51400) should be shown as 'Open to Consideration' to allow consideration of future proposals to 	<ol style="list-style-type: none"> 1-3. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>extent the permitted wind farm on its individual merits.</p> <p>3. The submission refers E-O-6 in relation to proposed setback distance of 10 x tip height and considers this as a negative approach and blatantly contravenes National Guidelines and the DHPLG 'preferred draft approach.'</p>	
P181	Derrykillew Community Windfarm	Gerard Smith	<p>1. The submission outlines support for wind energy and details planning permission granted by An Bord Plenala Ref 14/51400 at Derrykillew, Ballyshannon for 5 no. wind turbines describing the project as a community wind farm project (No map submitted). The submission outlines that in the CDP 2012, the area of the site of the project is identified as 'Open to Consideration' but in the Draft CDP, the area is 'Not Acceptable' for Wind Energy.</p> <p>2. The submission states that the rezoning of the lands as 'Not Acceptable' in the Draft CDP is not based on evidence to warrant the proposed change and the site is not located close to EHSA or a conservation site. States that the site has proximity to grid connection and is of low sensitivity landscape. Notes that EIA, EIS and landscape sensitivity were considered acceptable by An Bord Plenala. It therefore requests that map 8.2.1 be amended so as to:</p> <ul style="list-style-type: none"> (i) Reflect the original map in the existing CDP prior to the introduction of variation no 2 and; (ii) The area around the site of 14/51400 should be identified as and 'Area for Augmentation' and; (iii) The area for 5km around the permitted wind farm (14/51400) should be shown as 'Open to Consideration' to allow consideration of future proposals to extent the permitted wind farm on its individual merits. <p>3. The submission refers E-O-6 in relation to proposed setback distance of 10 x tip height and considers this as a negative approach and blatantly contravenes National Guidelines and the DHPLG 'preferred draft approach.'</p>	1-3. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P182	Derrykillew Community Windfarm	Patsy Quinn	<p>1. The submission outlines support for wind energy and details planning permission granted by An Bord Plenala Ref 14/51400 at Derrykillew, Ballyshannon for 5 no. wind turbines describing the project as a community wind farm project (No map submitted). The submission outlines that in the CDP 2012, the area of the site of the project is identified as 'Open to Consideration' but in the Draft CDP, the area is 'Not Acceptable' for Wind Energy.</p> <p>2. The submission states that the rezoning of the lands as 'Not Acceptable' in the Draft CDP is not based on evidence to warrant the proposed change and the site is not located close to EHSA or a conservation site. States that the site has proximity to grid connection and is of low sensitivity landscape. Notes that EIA, EIS and landscape sensitivity were considered acceptable by An Bord Plenala. It therefore requests that map 8.2.1 be amended so as to:</p> <ul style="list-style-type: none"> (i) Reflect the original map in the existing CDP prior to the introduction of variation no 2 and; (ii) The area around the site of 14/51400 should be identified as and 'Area for Augmentation' and; 	1-3. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>(iii) The area for 5km around the permitted wind farm (14/51400) should be shown as 'Open to Consideration' to allow consideration of future proposals to extent the permitted wind farm on its individual merits.</p> <p>3. The submission refers E-O-6 in relation to proposed setback distance of 10 x tip height and considers this as a negative approach and blatantly contravenes National Guidelines and the DHPLG 'preferred draft approach.'</p>	
P183	Derrykillew Community Windfarm	Ruairi McGee	<p>1. The submission outlines support for wind energy and details planning permission granted by An Bord Plenala Ref 14/51400 at Derrykillew, Ballyshannon for 5 no. wind turbines describing the project as a community wind farm project (No map submitted). The submission outlines that in the CDP 2012, the area of the site of the project is identified as 'Open to Consideration' but in the Draft CDP, the area is 'Not Acceptable' for Wind Energy.</p> <p>2. The submission states that the rezoning of the lands as 'Not Acceptable' in the Draft CDP is not based on evidence to warrant the proposed change and the site is not located close to EHSA or a conservation site. States that the site has proximity to grid connection and is of low sensitivity landscape. Notes that EIA, EIS and landscape sensitivity were considered acceptable by An Bord Plenala. It therefore requests that map 8.2.1 be amended so as to:</p> <ul style="list-style-type: none"> (i) Reflect the original map in the existing CDP prior to the introduction of variation no 2 and; (ii) The area around the site of 14/51400 should be identified as and 'Area for Augmentation' and; (iii) The area for 5km around the permitted wind farm (14/51400) should be shown as 'Open to Consideration' to allow consideration of future proposals to extent the permitted wind farm on its individual merits. <p>3. The submission refers E-O-6 in relation to proposed setback distance of 10 x tip height and considers this as a negative approach and blatantly contravenes National Guidelines and the DHPLG 'preferred draft approach.'</p>	1-3. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P184	Derrykillew Community Windfarm	Sean Dolan	<p>1. The submission outlines support for wind energy and details planning permission granted by An Bord Plenala Ref 14/51400 at Derrykillew, Ballyshannon for 5 no. wind turbines describing the project as a community wind farm project (No map submitted). The submission outlines that in the CDP 2012, the area of the site of the project is identified as 'Open to Consideration' but in the Draft CDP, the area is 'Not Acceptable' for Wind Energy.</p> <p>2. The submission states that the rezoning of the lands as 'Not Acceptable' in the Draft CDP is not based on evidence to warrant the proposed change and the site is not located close to EHSA or a conservation site. States that the site has proximity to grid connection and is of low sensitivity landscape. Notes that EIA, EIS and landscape sensitivity were considered acceptable by An Bord Plenala. It therefore requests that map 8.2.1 be amended so as to:</p> <ul style="list-style-type: none"> (i) Reflect the original map in the existing CDP prior to the introduction of variation no 2 and; 	1-3. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<ul style="list-style-type: none"> (ii) The area around the site of 14/51400 should be identified as and 'Area for Augmentation' and; (iii) The area for 5km around the permitted wind farm (14/51400) should be shown as 'Open to Consideration' to allow consideration of future proposals to extent the permitted wind farm on its individual merits. <p>3. The submission refers E-O-6 in relation to proposed setback distance of 10 x tip height and considers this as a negative approach and blatantly contravenes National Guidelines and the DHPLG 'preferred draft approach.'</p>	
P185	Derrykillew Community Windfarm	Michael Quinn	<p>1. The submission outlines support for wind energy and details planning permission granted by An Bord Plenala Ref 14/51400 at Derrykillew, Ballyshannon for 5 no. wind turbines describing the project as a community wind farm project (No map submitted). The submission outlines that in the CDP 2012, the area of the site of the project is identified as 'Open to Consideration' but in the Draft CDP, the area is 'Not Acceptable' for Wind Energy.</p> <p>2. The submission states that the rezoning of the lands as 'Not Acceptable' in the Draft CDP is not based on evidence to warrant the proposed change and the site is not located close to EHSA or a conservation site. States that the site has proximity to grid connection and is of low sensitivity landscape. Notes that EIA, EIS and landscape sensitivity were considered acceptable by An Bord Plenala. It therefore requests that map 8.2.1 be amended so as to:</p> <ul style="list-style-type: none"> (iv) Reflect the original map in the existing CDP prior to the introduction of variation no 2 and; (v) The area around the site of 14/51400 should be identified as and 'Area for Augmentation' and; (vi) The area for 5km around the permitted wind farm (14/51400) should be shown as 'Open to Consideration' to allow consideration of future proposals to extent the permitted wind farm on its individual merits. <p>3. The submission refers E-O-6 in relation to proposed setback distance of 10 x tip height and considers this as a negative approach and blatantly contravenes National Guidelines and the DHPLG 'preferred draft approach.'</p>	1-3. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P186		Mary Gildea	<p>1. The submission relates to lands at Cloghervaddy Hill/Altnapaste, Ballybofey and requests that the designation in relation to wind energy is amended so as to identify the lands as 'Open to Consideration' for the following reasons:</p> <ul style="list-style-type: none"> (i) The land is suitable for wind energy development as it is upland and there is significant forestry in the surrounding area; (ii) There are no occupied houses nearby; (iii) Its inclusion would contribute to the amount of land needed in County Donegal for wind energy potential and; (iv) It would provide a sustainable income for land owners in this rural area. 	1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P187	Canavan Associates	Seamus Canavan	<p>1. The submission relates to Wind Energy and to lands at Carrowmore, Eastern Illies, Inishowen. It states that the Draft CDP with restrictive zoning policies in relation to 10 x tip</p>	1-5 Refer to themed response on renewable energy contained in

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
	behalf of Corvin Wind Ltd		<p>height is departure from original pre 2017 Variation, will eliminate future wind energy development, will close County Donegal to wind energy, will impact on investment and the economy and is in direct contravention of National Policy, Regional Policy, Ministerial Circular PL5/2017 and Ministers Information note on revised wind energy guidelines.</p> <ol style="list-style-type: none"> 2. States that there is not adequate scientific evidence for Map 8.2.1. 3. Outlines EU and National renewable energy policy, obligations and targets and it will set a precedent for other Local Authorities. Suggests that in its current format, the Minister would call in the Draft CDP and modify it. Notes Circular PL5/2017 in relation to the reminder to local authorities of their statutory obligations in addressing renewable energy. 4. Encloses a detailed site assessment for the lands located at Carrowmore stating the lands are adjacent to two areas identified as 'Acceptable for Augmentation.' The assessment describes the suitability of the lands to be considered as 'Acceptable for Augmentation' for potentially 4 turbines. The assessment outlines a range of matters including that the site is in a locality of windfarm use and wind turbine planning permissions. States that it is at a distance from EHSA, not within any Natura 2000 sites, would not intrude on designated views and there are no dwellings with 500m of a proposed turbine. The submission states that the application of 10 x tip height could prejudice proposed turbines. The submission has provided Comparative visual assessments (14 in total). 5. Seeks specific amendments as follows to reflect national policy: <ol style="list-style-type: none"> (i) Objective E-O-6 deleted. (ii) Modification of E-P-12 including deletion of curtailment of extensions to wind projects and re-applications and production of a modified wind energy map. (iii) Acceptance that HSA's can be considered for wind energy. (iv) Amendment to Map 8.2.1 to include the site referred to in the submission located at Carrowmore as an area 'Acceptable for Augmentation' for the reasons outlined in a detailed site assessment report enclosed in the submission (point 4 above refers). Also states that the central Inishowen area should be identified as 'Open to Consideration' and that map 8.2.1 largely reflects the pre variation CDP map. (v) Amendment to the Development Guidelines and Technical Standards at section 6.5, page 173 so as to: <ul style="list-style-type: none"> ▪ Amend section 6.5(c) to delete reference to map 8.2.1 unless the map is superseded with the pre variation CDP wind energy map. ▪ Delete section 6.5 (e) regarding FWPM restrictions and replace with the need for appropriate studies to be conducted to scientifically assess risk and provide mitigation measures. ▪ Amendment of section 6.5(f) regarding set back distance to replace the requirement of 10 x tip height set back with a requirement for 4 x tip height or 500m set back from dwellings. Also seeks deletion of reference to 'other centres of human habitation.' ▪ Insertion of caveat that where household occupiers consent to turbines that 	<p>section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

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			the set back distance does not apply.	
P188	Canavan Associates on behalf of Corvin Wind Ltd	Seamus Canavan	<ol style="list-style-type: none"> 1. The submission relates to Wind Energy and to lands at Flughland between Illies and Quigleys Point in Inishowen. It states that the Draft CDP with restrictive zoning policies in relation to 10 x tip height is departure from original pre 2017 Variation, will eliminate future wind energy development, will close County Donegal to wind energy, will impact on investment and the economy and is in direct contravention of National Policy, Regional Policy, Ministerial Circular PL5/2017 and Ministers Information note on revised wind energy guidelines. 2. States that there is not adequate scientific evidence for Map 8.2.1. 3. Outlines EU and National renewable energy policy, obligations and targets and it will set a precedent for other Local Authorities. Suggests that in its current format, the Minister would call in the Draft CDP and modify it. Notes Circular PL5/2017 in relation to the reminder to local authorities of their statutory obligations in addressing renewable energy. 4. Encloses a detailed site assessment for the lands located at Flughland stating the lands are adjacent to two areas identified as 'Acceptable for Augmentation.' The assessment describes the suitability of the lands to be considered as 'Acceptable for Augmentation' for potentially 3 turbines. The assessment outlines a range of matters including that the site is in a locality of windfarm use and wind turbine planning permissions and would have been an 'Area Open to Consideration' the current CDP. States that it is at a distance from EHSA, not within any Natura 2000 sites, would not intrude on designated views and there are no dwellings with 500m of a proposed turbine(closest house is occupied by land owners. The submission states that the application of 10 x tip height could prejudice proposed turbines. The submission has provided Comparative visual assessments (13 in total). 5. Seeks specific amendments as follows to reflect national policy: <ol style="list-style-type: none"> (i) Objective E-O-6 deleted. (ii) Modification of E-P-12 including deletion of curtailment of extensions to wind projects and re-applications and production of a modified wind energy map. (iii) Acceptance that HSA's can be considered for wind energy. (iv) Amendment to Map 8.2.1 to include the site referred to in the submission located at Flughland as an area 'Acceptable for Augmentation' for the reasons outlined in a detailed site assessment report enclosed in the submission (point 4 above refers). Also states that the central Inishowen area should be identified as 'Open to Consideration' and that map 8.2.1 largely reflects the pre variation CDP map. (v) Amendment to the Development Guidelines and Technical Standards at section 6.5, page 173 so as to: <ul style="list-style-type: none"> ▪ Amend section 6.5(c) to delete reference to map 8.2.1 unless the map is superseded with the pre variation CDP wind energy map. ▪ Delete section 6.5 (e) regarding FWPM restrictions and replace with the need for appropriate studies to be conducted to scientifically assess risk and provide 	1-5 Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>mitigation measures.</p> <ul style="list-style-type: none"> ▪ Amendment of section 6.5(f) regarding set back distance to replace the requirement of 10 x tip height set back with a requirement for 4 x tip height or 500m set back from dwellings. Also seeks deletion of reference to 'other centres of human habitation.' ▪ Insertion of caveat that where household occupiers consent to turbines that the set back distance does not apply. 	
P189	Canavan Associates on behalf of Dunfanaghy Regeneration Steering Group Committee	Ulrike Kuhlmann	1. The submission is made on behalf of Dunfanaghy Regeneration Steering group outlining a number of proposals for the town including parking; pedestrianisation; walking and cycling routes; potential renovation of the Market House as a central attraction such as indoor market and other actions including in the area of critical supporting infrastructure. The submission suggests this could be the starting point for a local development plan for Dunfanaghy and could be incorporated into the settlement plan statement, objectives and policies of the CDP.	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P190	Canavan Associates on behalf of Mr. Pat Sweeney, Gortmacall, Milford	Seamus Canavan	<p>1. The submission relates to Wind Energy and to lands at Claggan-Loughdoo near Milford. It states that the Draft CDP with restrictive zoning policies in relation to 10 x tip height is departure from original pre 2017 Variation, will eliminate future wind energy development, will close County Donegal to wind energy, will impact on investment and the economy and is in direct contravention of National Policy, Regional Policy, Ministerial Circular PL5/2017 and Ministers Information note on revised wind energy guidelines.</p> <p>2. States that there is not adequate scientific evidence for Map 8.2.1.</p> <p>3. Outlines EU and National renewable energy policy, obligations and targets and it will set a precedent for other Local Authorities. Suggests that in its current format, the Minister would call in the Draft CDP and modify it. Notes Circular PL5/2017 in relation to the reminder to local authorities of their statutory obligations in addressing renewable energy.</p> <p>4. Encloses a detailed site assessment for the lands located at Claggan and Loughdoo, Milford describing the suitability of the lands to be considered as 'Open to Consideration' for potentially 2-3 turbines. The assessment outlines a range of matters including that the site is in a locality of windfarm use and wind turbine planning permissions and would have been an 'Area Open to Consideration' prior to the CDP variation. States that significant scoping studies have been carried out to date. States that it is at a distance from EHSA, not within any Natura 2000 sites, would not intrude on designated views and there are no dwellings with 500m of a proposed turbine. Also states that wind energy developments have been approved at Lurganboy, 3km to the northeast. The submission states that part of the site is within an area of 'High Scenic Amenity' and all areas are in an area of 'Wind Energy Not Acceptable'. The submission has provided Comparative visual assessments (6 in total).</p> <p>5. Seeks specific amendments as follows to reflect national policy:</p> <ul style="list-style-type: none"> (i) Objective E-O-6 deleted. (ii) Modification of E-P-12 including deletion of curtailment of extensions to wind projects 	1-5 Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>and re-applications and production of a modified wind energy map.</p> <p>(iii) Amendment to Map 8.2.1 to include the site referred to in the submission located at Claggan and Loughdoo, Milford as an 'Area Open to Consideration' for the reasons outlined in a detailed site assessment report enclosed in the submission (point 4 above refers) and that map 8.2.1 largely reflects the pre variation CDP map.</p> <p>(iv) Amendment to the Development Guidelines and Technical Standards at section 6.5, page 173 so as to:</p> <ul style="list-style-type: none"> ▪ Amend section 6.5(c) to delete reference to map 8.2.1 unless the map is superseded with the pre variation CDP wind energy map. ▪ Delete section 6.5 (e) regarding FWPM restrictions and replace with the need for appropriate studies to be conducted to scientifically assess risk and provide mitigation measures. ▪ Amendment of section 6.5(f) regarding set back distance to replace the requirement of 10 x tip height set back with a requirement for 4 x tip height or 500m set back from dwellings. Also seeks deletion of reference to 'other centres of human habitation.' ▪ Insertion of caveat that where household occupiers consent to turbines that the set back distance does not apply. 	
P191	Canavan Associates on behalf of Inishgaoth Ltd	Seamus Canavan	<ol style="list-style-type: none"> 1. The submission relates to Wind Energy and to lands at Leamacrossan, Carrowmore or Glentogher townlands near Quigleys Point and Glentogher in Inishowen. It states that the Draft CDP with restrictive zoning policies in relation to 10 x tip height is departure from original pre 2017 Variation, will eliminate future wind energy development, will close County Donegal to wind energy, will impact on investment and the economy and is in direct contravention of National Policy, Regional Policy, Ministerial Circular PL5/2017 and Ministers Information note on revised wind energy guidelines. 2. States that there is not adequate scientific evidence for Map 8.2.1. 3. Outlines EU and National renewable energy policy, obligations and targets and it will set a precedent for other Local Authorities. Suggests that in its current format, the Minister would call in the Draft CDP and modify it. Notes Circular PL5/2017 in relation to the reminder to local authorities of their statutory obligations in addressing renewable energy. 4. Encloses a detailed site assessment for the lands located at Leamacrossan, Carrowmore or Glentogher townlands near Quigleys Point and Glentogher in Inishowen describing the suitability of the lands to be considered as 'Open to Consideration' for potentially 6 turbines. The assessment outlines a range of matters including that the site is in a locality of windfarm use and wind turbine planning permissions and would have been an 'Area Open to Consideration' prior to the CDP variation. States that significant scoping studies have been carried out by the company to date. States the site is at a distance from EHSA, not within any Natura 2000 sites, would not intrude on designated views and there are no dwellings with 500m of a proposed turbine (closest turbines occupied by site landowners). States that 	1-5 Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>part of the site is within an Area of 'High Scenic Amenity' and all areas are in an area of 'Wind Energy Not Acceptable'. The submission has provided comparative visual assessments (13 in total).</p> <p>5. Seeks specific amendments as follows to reflect national policy:</p> <ul style="list-style-type: none"> (i) Objective E-O-6 deleted. (ii) Modification of E-P-12 including deletion of curtailment of extensions to wind projects and re-applications and production of a modified wind energy map. (iii) Acceptance that HSA's can be considered for wind energy. (iv) Amendment to Map 8.2.1 to include the site referred to in the submission located at Leamacrossan, Carrowmore or Glentogher townlands near Quigleys Point and Glentogher in Inishowen as an 'Area Open to Consideration' for the reasons outlined in a detailed site assessment report enclosed in the submission (point 4 above refers) and that map 8.2.1 largely reflects the pre variation CDP map. (v) Amendment to the Development Guidelines and Technical Standards at section 6.5, page 173 so as to: <ul style="list-style-type: none"> ▪ Amend section 6.5(c) to delete reference to map 8.2.1 unless the map is superseded with the pre variation CDP wind energy map. ▪ Delete section 6.5 (e) regarding FWPM restrictions and replace with the need for appropriate studies to be conducted to scientifically assess risk and provide mitigation measures. ▪ Amendment of section 6.5(f) regarding set back distance to replace the requirement of 10 x tip height set back with a requirement for 4 x tip height or 500m set back from dwellings. Also seeks deletion of reference to 'other centres of human habitation.' ▪ Insertion of caveat that where household occupiers consent to turbines that the set back distance does not apply. 	
P192		Daniel McGinley	<p>The submission relates to Moville.</p> <ol style="list-style-type: none"> 1. Requests the designation of lands between the pier and the premises previously known as Anchor/Hair of the Dog as "Amenity Areas"; the submission includes a significant amount of information including text, legal documents, photographs and site history in support of this request to demonstrate the rationale for this proposal. 2. Requests the inclusion of a specific and clear written objective to secure lands in front of premises previously known as Anchor/Hair of the Dog and around the pier as publicly accessible open space. 3. Submission requests that the path from the pier to Bath Green be scheduled as a RIGHT OF WAY and so listed in Table 18 Appendix 3 and also included in the Rights of Way in Map 01 Appendix 3; supporting information for this request has been provided in extracts from historic deeds and as transferred by memorials. <p>Submission claims that the designation of Moville as a strategic town will be contravened if</p>	1-9 Refer to themed response on tourism contained in section 3.8 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>the open space/right of way at the Pier is blocked.</p> <ol style="list-style-type: none"> 4. Submission, in support of its request to have these specific land zoned, makes reference to planning history of the site in relation to An Bord Pleanalas decision (ref 247494), to refuse alterations to the land and adjustment of the boundary to provide for private grounds for the adjoining property (formerly a public house) for reasons that: <ul style="list-style-type: none"> ▪ The existing established use of the site is enjoyed by the public and development of this land would prohibit access to the pier, the water way and the shoreline walk. ▪ The reduction in parking and circulation space at this land and sea interface would likely result in traffic turning movements in a more confined space closer to the water's edge which would endanger public safety by reason of a traffic hazard. ▪ Would reduce the width of the path available for walking and move it closer to the edge which would endanger public safety. <p>Resultantly An Bord Pleanala request that DCC have this public space and right of way designated as such in the CDP 2018-2024.</p> 5. Submission highlights concern over pier safety following the recent tragic events at Buncrana pier. 6. Submission details the following extract from the Planners report on application ref 16/51217 "the parent property historically had an open frontage arrangement and that this open frontage had been used as parking area associated with the use of the adjoining pier and harbour, has been used as a viewing gallery during local events and regattas and has facilitated a ROW from Bath Green to the Harbour". Submission is accompanied by numerous photographs of events at this location and the use of the area by the public. 7. Submission details the history of the pier and refers to the historic links to the Montgomery Family (supporting documents attached), and the significant historical and heritage value of the town referencing its designation as a Heritage town, and recent tourism potential. 8. The submission makes specific reference to policies within the CDP 2012-2018, including policy TOU-O-8, CCG-P-7 and CCG-P-25 that relate to walking routes, cycleways, POWs, public accessibilities, and cultural needs. 9. Submission states that: <ul style="list-style-type: none"> ▪ Merville pier is of cultural importance given its maritime legacy, emigration point and has a wooden sculpture depicting this. ▪ Merville Greencastle pathway is a protected walkway in the CDP ▪ Merville is part of the WAW; their website states that the town has a role as a centre of leisure facilities and advertises Inish Adventures and Shore Angling. 	
P193	Allan Curran Architects Ltd on behalf of Mr. Johnny Hughes.	Roci Allan	<ol style="list-style-type: none"> 1. Submission requests the zoning of a specific parcel of land in Rossnowlagh for "Development". 2. Submission references the following previous planning applications on the site: 97/1539, OPP granted for erection of 8 dwellings and septic tank; 01/32 application for approval relating to 97/1539 withdrawn; 06/21601, Application for 5 detached dwellings with septic 	1-4. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>tank and extension to existing treatment plant deemed withdrawn; 12/20137, application for 1 dwelling and associated site works refused for 1 reason associated with the location of the subject site within lands zoned as amenity in the CDP 2012-2018.</p> <p>3. Maps accompanying the submission show the following: settlement boundary for Rosstown and location of subject site; zoning of the site in the Rosstown LAP 2005-2011; zoning of the site in the CDP 2012-2018; site location map; subject lands zoned as existing development in LAP 2005-2011; map showing area of requested rezoning.</p> <p>4. Makes reference to an extract from the planners recommendation report as part of planning application 12/20137 which states "the site is visible from the north over a long distance and given that the lands rise further to the rear it is not considered that there would be an integration problem that would give rise to a visual amenity concern as viewed from lands at the north". Owing to this, the argument is proffered that development of the lands in a manner that would allow their integration into the landscape, that OPP was previously granted for 8 dwellings and the lands were previously zoned for development and that the council should consider zoning the lands as requested and as indicated on attached maps.</p>	B of this report.
P194		Derek & Roisin McLaughlin	<p>1. Submission requests an extension to LAP boundary of Carndonagh to facilitate the development of lands (folio 49024F) for development and future provision of services for Carndonagh Parish Area, and states that planning permission had previously existed on these lands, 08/70403 refers. No location map has been submitted.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P195		Dan Callaghan	<p>1. Submission requests zoning of 20 acres of land within Killygordon Village for residential/commercial use. Rationale given that the site is accessible to all amenities, lighting, footpaths, ESB, public sewer and is situated on the N15. States that site is within walking distance of 2 primary schools, community playgroup, resource centre, 2 village cafes, 3 sporting clubs, churches, pubs, shops and hairdressers. Subject site is indicated on behalf of Dan Callaghan. Site location is illustrated on an attached map.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P196	Bord Iascaigh Mhara	Joanne Gaffney	<p>1. Submission requests that aquaculture be supported in chapter 4, 'Economic Development' or chapter 10, 'Marine Resource and Coastal Management' in order to align the CDP with National and Regional aquaculture policy.</p> <p>2. Outlines that the Draft Plan clearly acknowledges the value of the aquaculture sector detailing an extract of text from the Draft Plan that includes ".....the council will support the sustainable development of onshore/ancillary aquaculture developments to maximise the potential of the sector in terms of employment and product export.". However the submission queries the approach of the council stating that the commitment to support "onshore/ancillary aquaculture" as above, is a departure from the CDP 2012-2018 which states "In accordance with Government policy, the Council will support the sustainable development of the aquaculture sector to maximise its contribution to economic growth</p>	<p>1-5. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>within the County. In particular, the Council acknowledge the development and expansion of the oyster farming industry in the County and its potential in terms of employment and product export." Submission suggests that this text be reviewed in line with regional and national policy on aquaculture and the contribution this makes to coastal communities.</p> <ol style="list-style-type: none"> 3. States that the Draft CDP is proposing a large expansion on Areas of Especially High Scenic Amenity (EHSA's) and states that, having regard to the Landscape Character Assessment, it is unclear how a decision on such a large blanket expansion was reached without consideration of views and prospects or the uniqueness of a stretch of coastline, and that much of this area does not fit with the definition of areas in the previous plan. 4. Submission raises concerns that the blanket designation of EHSA's will restrict economic development of industries such as aquaculture that must be located in the coastal zone. 5. Submission requests that: <ul style="list-style-type: none"> ▪ the proposals are reviewed, ▪ more clarity is provided on how the designations were reached, ▪ Explain if there has been a change in the definition of EHSA's. ▪ Look at creating a greater mosaic of EHSA and High Scenic Amenity (HSA) in line with the approach taken in County Kerry for example. 	
P197		Margaret & Michael Hynes	<p>Submission relates to the Stranorlar area and request the following:</p> <ol style="list-style-type: none"> 1. Drumboe woods be further developed for a community amenity area with picnic facilities along the river walk. 2. Further development of river walks at the opposite side of the twin towns bridge including the development of a footbridge as existing path is too narrow and unsafe. 3. Dunwiley Wood be preserved as a designated green amenity area; it has an abundance of plants, flora and birds and one of the few remaining habitats of the red squirrel. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P198		Aine Conaghan	<ol style="list-style-type: none"> 1. Submission is described as being specific to the Sustainable Management of Tourism Destinations (SMTD) and Stakeholder Consultation in the context of wind energy. It references the conflict from these topics and details that 2017 is the UN international year of 'Sustainable Tourism for Development' recalling the potential of tourism to advance the universal 2030 agenda for sustainable development with aims to support a change in policies, business practices and consumer behaviour towards a more sustainable tourism sector that can contribute effectively to sustainable development goals. 2. Submission sets out the academic and professional background of the author. 3. Sets out the following concerns on the impact of windfarm development in areas open for consideration as a member of the rural community, and provides a narrative for each as part of the submission: <ul style="list-style-type: none"> ▪ Implications on natural environment, visual impact and noise ▪ Health related impacts ▪ Impacts on animals 	<ol style="list-style-type: none"> 1-11. Refer to themed response on tourism contained in section 3.8 of this report and to the themed response on renewable energy contained in section 3.7.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ Further of rural area ▪ Dark skies ▪ Effects on reputation 'coolest place on the planet' ▪ Economic value impact on tourism ▪ Tourism contribution to Donegal's employment ▪ Impacts on walkways and hillwalks ▪ Flooding of the landscape <ol style="list-style-type: none"> 4. Submission gives an overview of wind energy in Donegal in terms of energy, number of windfarms vis-a-vis the rest of Ireland, capacity of windfarms in Donegal vis-a-vis the rest of Ireland, redundant windfarms, and proffers that it is time for the entire county to be 'not favoured' for windfarms developments.. 5. Makes reference to a cross border study conducted in 2007 to determine holidaymakers attitudes to windfarms, and states it is critical for DCC to acknowledge there is no current up to date data on this, and comparing attitudes from 2007 when there were 67 windfarms in Ireland to now when there are 295 is not justifiable. 6. Makes reference to an EIS submitted as part of the Carrickaduff development in Donegal and their opinion on its content. 7. States that there is a huge financial investment from tourism related funding programmes (lists 14 examples including the 2017 Outdoor Recreation Infrastructure scheme as part of the Government's Action Plan for Rural Development) and the necessity to reflect on these and acknowledge what integrates them. Expands with background and ancillary narrative. 8. Submission queries the discrepancies between amenity designations and wind energy designations in the Draft CDP and suggests this demonstrates a lack of correlation between the designations. Requests that this be revised and Donegal be removed as an area not to be considered for further energy development. 9. Submission gives a narrative under the headings 'Tourism 10 years from now', 'Towards the sustainable management of tourism destinations', 'Context of Irish Tourism', 'Donegal tourism structure in context of sustainable management of tourism', 'Marketing of tourism' and 'stakeholder involvement in sustainable tourism'. 10. Suggests that a primary objective for any windfarm locations in Ireland should remain focused on safeguarding tourism by protecting environmental quality. States that tourism revenue is one of the major contributors to the national economy and a significant source of full time and part time employment; during 2013 the total tourism revenue for Ireland was €5.9billion. 11. Windfarm applications do not adequately regard the environmental, cultural heritage and stakeholders in proposed developments. Suggests that the shift towards the sustainable management of tourism destinations is being consolidated at an international level and the focus must remain on the drive towards sustainable management of tourism destinations. 	

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P199		Sarah Conaghan	<ol style="list-style-type: none"> 1. Submission requests protection and enhancement of the environment and that there are no more windfarms in County Donegal . 2. Outlines how existing windfarms in the local area near Trusk Lough, Ballybofey have changed the landscape over the past 20 years, impacting on home and the wider landscape. 3. States that County Donegal has a disproportionate number of windfarms relative to the rest of the country. 4. Suggests that existing National subsidies paid towards wind energy would be better directed to other essential services. 5. Outlines concern in relation to the environmental impact of wind farms including removal of trees, flooding impacts, landscape scarring, impact on SAC's and habitats/ protected species, impact of public water supplies and bore holes. Makes particular reference to 2 reports: one of which refers to 'The Irish Lady's Tresses Orchid', a protected plant, vulnerable from extinction and found nowhere else in Donegal, and the other a survey by the Botanical Society of the British Isles that found over 90 species of rare flowers in this area. 6. Refers to a report on the lack of desire to visit areas of windfarms entitled 'Mountaineering Council of Scotland Report from July 2016.' And provides a link to this report. 	1-6. Refer to themed response on renewable energy contained in section 3.7 of this report.
P200		Carl Scanlon	<ol style="list-style-type: none"> 1. Submission requests that the following be included in the CDP: <ul style="list-style-type: none"> ▪ Revised Option 3 of the Draft CDP remain in place. ▪ 10x tip height remain in place ▪ LCA 40 and 41 remain unfavourable for wind farm development ▪ LCA 40 should be deemed an area of EHSA 2. In support of (and justification for) these requests the submission has made the following points: <ul style="list-style-type: none"> ▪ The impact of wind farms on boglands and subsequently flooding. Sets out the importance boglands for habitats and species, as a carbon sink, and in acting as vast water reservoirs and that there should be a focus on replenishing and protecting natural peat boglands, makes specific reference to the importance of this within the Caskhelnavern LCA to protect the Finn Valley lowlands. ▪ Outlines the importance of protecting the Hen Harrier and SAC's and SPA's particularly in the Finn Valley and Cashelnavern areas. ▪ Potential negative impact on a number of tourist facilities and attractions, claiming that any windfarm development in the Finn valley and Cashelnavern areas would drive tourists away. ▪ Impact of noise from wind turbines referring to a recent court case at Banteer, County Cork (where 7 families had to leave their homes due to noise disturbance from nearby windfarm) the noise level was 35Dba noting that the developer in this case admitted liability in court. Proffers that Cashelnavern 	1-2. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			LCA is a low noise environment and a separation distance of 2 km would be required; that Cashelnavern is not suitable for industrial turbines and should not be an area 'Open for Consideration.'	
P201		Christina Martin	1. Submission requests that no more wind turbines are erected in Glenfinn, especially the Three Tops, Cearc area	1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P202		Cordelia Nic Fhearraigh	<ol style="list-style-type: none"> 1. The submission suggests that the Irish language will disappear completely from the remote, marginalised, vulnerable areas of the Gaeltacht if DCC and other state bodies do not begin to act vigorously to protect and preserve the language. 2. Submission suggests that Government departments and state bodies have a duty to implement and Irish language policy, to recognise the Gaeltacht and Irish speaking community, be more active in the in the promotion of the Irish language in the community. 3. Submission states it is not enough to leave the protection and preservation of the Irish language to community and voluntary groups and committees, and not be waiting on the public to raise questions and make complaints on the lack of services through Irish. 4. Suggests that all maps in the Gaeltacht should have text in Irish only and lists a number of examples contained in the Draft Plan 5. Suggests that the names of the Islands within the Gaeltacht should only be referred to in Irish within the English version of the Draft Plan, page 153. 6. Proffers that all council staff with fluency in Irish be employed to allow DCC become more active in the promotion of the Irish language. 7. Suggests all internal and external signage within DCC offices be in Irish and front line staff offer a bilingual greeting. 8. Suggest DCC initiate an Irish language campaign to inform the public that services in Irish are welcome and should be compulsory in Gaeltacht areas 9. Suggest that public transport is urgently required in the Gaeltacht. 10. Suggests there be an Irish language condition within the Gaeltacht that includes: <ul style="list-style-type: none"> ▪ Irish must be the family and working language of any person or organisation in the Gaeltacht. ▪ A complete ban on people/families without Irish locating/settling in Gaeltacht areas. ▪ Irish names reflecting the local history be given to housing estates across the county, and should not be the responsibility of the developer. 11. Suggests the establishment of an active committee to change the names of housing estates to Irish. 12. Suggests the protection and preservation of the Irish language in the Gaeltacht ht be considered during the development of any tourism strategy/plan. Claims there is no plan to promote the Irish language as part of tourism events/schemes/businesses. 	<ol style="list-style-type: none"> 1. to 8. Refer to themed response on community, culture and the Gaeltacht contained in section 3.10 of this report. 9. The council is fully supportive of providing public transport in all areas of the county inclusive of the Gaeltacht as evidenced by objective T-O-10 and policy T-P-11 (p65) of the Draft CDP. 10. to 15. Refer to themed response on community, culture and the Gaeltacht contained in section 3.10 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>13. Suggests that at section 9.3 of the draft Plan the Sentence that begins "All Business/Community signage....." have the second part of the sentence removed so that it reads: "All Business/Community signage in the Gaeltacht shall be in Irish only". Rationale offered is that these areas are marginalised, remote and vulnerable and the use of English is spoiling the area.</p> <p>14. Suggests the removal of English placenames from all tables with English versions of Gaeltacht placenames including: table 2.3,2.5,2.6,3.1.</p> <p>15. Suggests focus should be more on sustainable development and generations on and place less emphasis on wealth and profit.</p>	
P203		Margaret McCallig	<p>1. Submission welcomes the inclusion of the following elements of variation no 2 of the existing CDP:</p> <ul style="list-style-type: none"> ▪ Continuation of areas identified as having no capacity for wind farm development as a result of being an SAC, SPA, NHA, areas of high and medium landscape sensitivity, FMPM areas and catchments, and important views and prospects among others. ▪ Set back distance of 10x the tip height. <p>2. Raises concerns in relation to areas identified as suitable for augmentation as some areas have been so designated despite no wind farm being currently in existence in those sites and gives examples at Mully/ Graffy. With reference to lands in the writers ownership in Mully/ Graffy (no map included) the submission requests that these and other lands that have no existing windfarm or extant permission be removed from the areas identified for augmentation, subject to a new assessment (photo evidence).</p>	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report.</p> <p>2. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P204	Fehily Timoney & Company	Jim Hughes	<p>1. Note the positive plan policies in relation to wind energy namely E-O-5 and E-O-10 which in themselves are consistent with the 'Wind Energy Development Guidelines' 2006 and 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change', July 2017 .</p> <p>2. Submission notes the section 28 statement in the Draft CDP which refers to the consideration of a non- executive report submitted to the council and questions the availability of the report. State that the omission of the report from the public participation process and inconsistencies with national guidelines may bring into question the legality of the Draft CDP if adopted.</p> <p>3. Submission states that the Environmental Report does not demonstrate how the ten times tip height separation distance could impact on achieving national energy policy targets. Notes that this may contravene the 'Interim Guidelines which states that such proposals shall be a material consideration in the Environmental Report.</p> <p>4. Submission questions the methodology underlying the land-use zoning map for wind energy and notes that the reduction in areas 'Open to Consideration' taken together with the 10 times tip height separation distance, could preclude any additional wind energy development in the County. Submission notes the Draft CDP indicates that two reports underlying the</p>	<p>1. to 8. Refer to themed response on renewable energy contained in section 3.7 of this report. and the Natura Impact Report contained in section 3.11 of this report.</p> <p>9. Refer to themed response on renewable energy contained in section 3.7 and to themed response on the Environmental Report and the Natura Impact Report contained in section 3.11 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>methodology relate to FWPM and noise and state that the robustness of these reports is unclear in a spatial land-use strategy. State that if these reports are to be relied upon, they should be adopted into the development management objectives and not land use zoning.</p> <ol style="list-style-type: none"> 5. States that land use zoning directs developers to appropriate locations where wind energy development is acceptable in principle and the onus is then on the competent authority to determine site specific considerations. 6. Note that FWPM already has protection under the existing CDP and that there is not a blanket ban on all development within FWPM catchments. Notes EU Commission advice that the Habitats Directive does not exclude wind farm development in or adjacent to Natura 2000 sites and these should be judged on a case-by-case basis. Suggests consideration of a policy similar to EX-P-3 which is a 'positive' policy objective which applies to quarrying. 7. Outlines that Natura 2000 network is not a system of strict nature reserves where all human activities are excluded. 8. Outlines concern that the limitation on wind energy development is inconsistent with the Wind Energy Guidelines 2006 to secure the maximum potential from wind energy resources and is also inconsistent with the Interim Guidelines which require development plans to indicate how the plan will contribute to realising overall national targets on renewable energy. 9. Note also that the Environmental Report has not assessed the implication of the draft zoning policy and therefore if adopted, the plan could be challenged. 	
P205		Susan Mc Clafferty	<ol style="list-style-type: none"> 1. The submission requests a new speed limit of 60kph in Kilmacrennan village claiming it is critical as a result of the new junction and will be compounded by the construction and improvement of the N56 that will increase the traffic speed on this road. 2. Submission proposes a car park facility be provided at the cycling track where it commences at the Illistrin Top for the following reasons: <ul style="list-style-type: none"> ▪ Safety of the public ▪ to attract more cycling enthusiasts to venture into Kilmacrennan, providing a gateway from Letterkenny ▪ Enhance the attraction of the community ▪ Will increase tourism in the area and make it a more environmentally friendly area. 	<ol style="list-style-type: none"> 1. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 2. Comments noted – however, the matters raised are outside the remit of the Draft CDP.
P206	Martin O'Donnell Architectural Consultant on behalf of Foylegrange Developments Ltd.	Martin O'Donnell	<ol style="list-style-type: none"> 1. Submission relates to a specific site located at Culineen, Redcastle. 2. Submission sets out that this site is located in an area under strong urban influence in the existing CDP 2012-2018 and is within an area of HSA in the Draft CDP. The objectives and policies pertaining to EHSA and HSA are detailed. 3. Submission states their opinion that that the subject site "has the capacity to absorb sensitively located development of scale, design and use that will enable assimilation into the receiving landscape and which does not detract from the quality of the landscape subject to compliance with all other objectives and policies of the plan" for the reasons set out below: 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report. 2. Refer to themed response on core strategy and housing contained in section

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			<ul style="list-style-type: none"> ▪ Claims that the principle of residential development was established on the understanding that a densely planted buffer zone was provided with the waiving up public open space within the development in, during correspondence as part of planning application 07/71003 (refused) . Submits supporting documentation in the form of proposal drawings and Design Concept. ▪ The site is central to the village of Redcastle, supporting location map and aerial photography submitted. ▪ The development of this land would enhance the locality and provide an opportunity to upgrade existing services in the area. 	<p>3.1 of this report.</p> <p>3. Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p>
P207		Charlene Mc Clintock	<ol style="list-style-type: none"> 1. Submission requests that the Cashelnavern LCA be classed as an area of Especially High Scenic Amenity and that Cashelnavern and Finn valley LCA remain 'Unacceptable for Wind Farm development' due to their ecological importance, the potential impact on visual amenity and potential property devaluation. 2. Welcomes the set back distance of turbines to residential properties and other centres of human habitation of ten times tip height and requests that it is carried on into the new CDP. 3. Notes recent circulars and states that relevant ministers continue to have the interests of large wind developers at heart and fail to address the problems associated with wind turbines, and that the current guidelines are not fit for purpose. 4. States that the suggested noise levels of maximum 43DbA in the guidelines are not in keeping with international standards and those of the World Health Organisation which recommends a maximum of 40DbA. Purports that rural areas are low noise environments and that good practice would suggest levels do not surpass 5DbA above background noise. States that 40 to 43DbA would grossly exceed 5DbA above background noise in most rural areas and particularly at night. 5. Submission refers to recent National Scale Acoustic Model for wind farm noise in Ireland carried out by RPS which found that a setback of 1200 m would be required to achieve 40DbA. 6. Suggest that the set back distance of 1200m required by new guidelines will not address shadow flicker and that to do so. Claims that turbine manufacturers recommend siting turbines ten times rotor diameter from affected properties which would be more than four times tip height. 7. State that the new guidelines suggest that to address shadow flicker and noise, technology can be used to control and restrict turbine operation. Contends that this is counterproductive, irresponsible development, is not environmentally friendly and does not make economic sense. 8. Refers to the Carrickaduff wind farm that was refused permission and that had windfarms surrounding homes by 180 degrees; states that no home should be encircled by turbines regardless of the set back as it would undoubtedly destroy the amenity and enjoyment of 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report. 2. to 7. Refer to themed response on renewable energy contained in section 3.7 of this report. 8. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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P208	Paul Doherty Architects Ltd on behalf of Rory McGinty	Paul Doherty	<p>the property and render such property worthless.</p> <ol style="list-style-type: none"> Submission requests the area outlined on supporting maps (maps submitted) to the south west of Manorcunningham to be included within the town boundary of Manorcunningham. For the following reasons: <ul style="list-style-type: none"> Permission was previously granted for a local area shop and filling station and it currently has permission for a garage. It is proposed to develop the site for a local shop for the benefit of large number of adjoining housing. The existing town boundary is located along the centre line of an existing roadway and this provides an unfinished edge to the town. An extension of the boundary would be beneficial in creating streetscape and this would act as a natural traffic calming measure. The proposal will provide employment and this in turn will reduce reliance on Letterkenny as a centre for employment, thereby reducing vehicle journeys to Letterkenny and traffic congestion. The area is served with adequate infrastructure. 	<ol style="list-style-type: none"> Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P209	WestBic	Eunan Cunningham	<ol style="list-style-type: none"> Sets out that DCC need to prioritise provision of broadband at a reasonable cost to the business community of Donegal and it is an urgent matter requiring immediate attention. Welcomes advances in provision of broadband but outlines concerns that providers refuse to provide broadband at a reasonable cost to the business community in the Údarás na Gaeltachta Industrial estate in Ballymoon, Kilcar. States that commendably, nearby households are having fibre installed under the fibre to the home scheme but that the business community must be prioritised. Commends the development of the Sliabh Liag projects. States that the speed limit signs in Carrick and Kilcar should be examined and states that there should be a rule that two speed limit signs can only be placed where the road is of a certain width. Suggests that Kilcar should be designated as a Strategic Town based on its strategic importance in the development of employment in a peripheral rural area. Notes the current correct spelling of Kilcar in Gaeilge is Cill Charthaigh stating 'which itself is a subject of debate'. States that either of the two following versions should be used namely 'Cill Charthaigh' or 'Cill Chartha'. 	<ol style="list-style-type: none"> Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. Refer to themed response on Infrastructure contained in section 3.3 of this report. Noted. Comments noted – however, the matters raised are outside the remit of the Draft CDP. Refer to themed response on core strategy and housing contained in section 3.1 of this report. Comments noted.
P210		Susan Tourish	<ol style="list-style-type: none"> Requests that no more wind farms be considered or if this is not possible, that they are at least ten times the rotor tip height away from residential areas. 	<ol style="list-style-type: none"> Refer to themed response on renewable energy contained in section 3.7 of this report.
P211		Louise Howard	<ol style="list-style-type: none"> Submission requests that the following be included in the CDP: <ul style="list-style-type: none"> Revised Option 3 of the Draft CDP remain in place. 10x tip height remain in place LCA 40 and 41 remain unfavourable for wind farm development 	<ol style="list-style-type: none"> Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can

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			<ul style="list-style-type: none"> ▪ LCA 40 should be deemed an area of EHSA <p>2. In support of (and justification for) these requests the submission has made the following points:</p> <ul style="list-style-type: none"> ▪ The impact of wind farms on boglands and subsequently flooding. Sets out the importance boglands for habitats and species, as a carbon sink, and in acting as vast water reservoirs and that there should be a focus on replenishing and protecting natural peat boglands, makes specific reference to the importance of this within the Cashelnavern LCA to protect the Finn Valley lowlands. ▪ Outlines the importance of protecting the Hen Harrier and SAC's and SPA's particularly in the Finn Valley and Cashelnavern areas. ▪ Potential negative impact on a number of tourist facilities and attractions, claiming that any windfarm development in the Finn valley and Cashelnavern areas would drive tourists away. ▪ Impact of noise from wind turbines referring to a recent court case at Banteer, County Cork (where 7 families had to leave their homes due to noise disturbance from nearby windfarm) the noise level was 35DbA noting that the developer in this case admitted liability in court. Proffers that Cashelnavern LCA is a low noise environment and a separation distance of 2 km would be required; that Cashelnavern is not suitable for industrial turbines and should not be an area 'Open for Consideration.' 	<p>be viewed in Appendix B of this report.</p> <p>2. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P212	Martin O'Donnell Architectural Consultant on behalf of Foylegrange Developments Ltd.	Martin O'Donnell	<ol style="list-style-type: none"> 1. Submission relates to a specific site located in the townland of Drung, Redcastle. 2. Submission sets out that this site is located in an area under strong urban influence in the existing CDP 2012-2018 and is within an area of HSA in the Draft CDP and adjoins a cluster of 20 detached dwellings. 3. The objectives and policies pertaining to EHSA and HSA are detailed. 4. Submission states their opinion that that the subject site "has the capacity to absorb additional development that is suitably located, sited and designed subject to compliance with all other objectives and policies of the plan" for the reasons set out below: <ul style="list-style-type: none"> ▪ Claims that the principle of residential development has been established and that in their opinion an extension to the existing development known as Marshalls Meadows would not adversely affect the classification of the eider landscape. ▪ Supporting documentation in the form site map and aerial photograph show a number of existing detached dwellings and that in their opinion an extension to this would be in keeping with the character of the area drawings and Design Concept. ▪ Correspondence attached from the PA in 2008 in association with 07/70996, advises that siting and design was not an issue subject to a reduction in ffls. ▪ There are existing services to this site and the development of this land would enhance the locality and provide an opportunity to upgrade existing services in the area that would be of benefit to all residents. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report. 2. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 3. Comments noted 4. Refer to themed response on core strategy and housing contained in section 3.1 of this report.

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P213	SLR Consulting Ireland	Tim Paul	<p>1. This submission was lodged by by SLR Consulting on behalf of Roadstone Ltd. and relates to the extractive industry.</p> <ul style="list-style-type: none"> ▪ The submission cites Section 4.4 and Section 6.4 of the Regional Planning Guidelines for the Border Regional Authority 2010-2022 and provides a backdrop on the importance of the extractive industries for construction. The submission notes that Section 4.1 of the Draft CDP, which addressed general economic development, does not refer specifically to extractive industries or associated value-added products. ▪ The submission states that policy ED-P-3 indicates that industrial development in the countryside must be related to a site specific product resource but notes that this is not cross referenced in policy ED-P-8 and ED-P-10. As such, an additional specific policy is recommended as follows; <p style="margin-left: 20px;">“It is a policy of the Council to consider proposals for the development or expansion of economic development in the countryside relating to a site specific product resource, subject to compliance with the provisions of policy ED-P-10 or policy ED-P-14”.</p> ▪ The submission also suggests amendments to policy ED-P-10 as follows (suggested text coloured blue); <p style="margin-left: 20px;">“It is a policy of the Council to consider proposals for the expansion or re-development of an existing economic development in the countryside provided the scale and nature of the resultant development will contribute positively to the long-term sustainability of the existing enterprise, subject to compliance with all relevant provisions of Policy ED-P-14. A proposal which would not meet these criteria will only be permitted in exceptional circumstances where it can be demonstrated that: <ul style="list-style-type: none"> • the proposal would provide for consolidation and/or remediation of the existing facilities or the proposal relates to a site specific product resource; • where relocation of the enterprise would not be possible; • the proposal would make a significant contribution to the local economy; • the development would, where possible, maintain the existing rural character of the area; and • where infrastructural improvements are required that a developer-led solution can be identified and delivered. </p> <p>2. The submission suggests that Policy WES-P-4 should be re-worded as follows (suggested text coloured blue)–</p>	<ul style="list-style-type: none"> • With regard to the suggestions concerning Policy ED-P-3, ED-P-8 and ED-P-10 of the Draft Plan, it considered that this policy is clear in providing that industrial developments in the countryside will be considered if related to a site specific product resource, and subject to all other relevant criteria. Additional text and/or polices are not considered necessary in this respect. • With regard to the ‘aim’ set out under Section 8.1, the Draft CDP aims to support the local economy and hence the suggested deletion of the reference to ‘locally sourced aggregates’ is not considered appropriate. The reference to ‘significant’ environmental effects is considered reasonable and would be consistent with the language used in relation to Environmental Impact Assessment in the Planning & Development Acts. <p>Recommendation: It is recommended that the aim for Section 8.1 be amended as follows (new text shown in blue) –</p> <p>‘To facilitate the appropriate and sustainable extraction of locally sourced aggregates and/or minerals that contribute to the local economy and ensuring that such activity</p>

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			<p>"It is a policy of the Council to protect the environment from significant adverse impact through directing and controlling development, enforcement, licensing and direct intervention."</p> <p>3. The submission notes the 'protected views' identified on Map 7.1.1 and the associated Policy NH-P-13. The submission notes that views are not numbered or described in the text and suggests that this should be done in the interests of clarity.</p> <p>4. It is suggested that Objective NH-O-8 should be re-worded as follows (suggested text coloured blue)- "To ensure where appropriate the protection and conservation of hedgerows, stone walls and traditional field boundaries as natural heritage corridors and migration routes for wildlife where they are shown to play a significant heritage role. If the removal of such features is necessary, appropriate replacement hedgerow or stonewalls should be provided, if possible, within the application site".</p> <p>5. It is suggested that Policy NH-P-10 should be re-worded as follows (suggested text coloured blue)- It is a policy of the Council to retain and protect significant stands of existing trees/hedgerows/woodlands, and seek increased planting of native trees where appropriate in new developments. Where the removal of trees/hedgerows/woodlands is unavoidable, replacement trees should be provided, if possible, within the application site".</p> <p>6. It is suggested that Policy NH-P-11 should be re-worded as follows (suggested text coloured blue and deleted text shown in strikethrough)- "It is a policy of the Council to seek the protection of stone wall boundaries where they are shown to play a significant heritage role. Where the demolition of such stone walls is unavoidable, the reinstatement of stone walls at revised location/set back within the site using agreed local materials and techniques, will be required. should be reinstated, if possible, at revised location/set back within the site using agreed local materials and techniques."</p> <p>7. It is contended that national policy/guidance does not appear to address the concept of the 'setting' of a monument and it is suggested that, in certain policies relating to archaeological heritage protection, reference to 'setting/character' should be removed as follows (deleted text shown in strikethrough) -</p> <p>AH-P-1 It is a policy of the Council to protect and enhance the integrity of Archaeological Monuments and their settings and to secure the preservation in- situ of all archaeological monuments included on the Record of Monuments and Places. Preservation by record shall</p>	<p>does not significantly adversely affect issues of acknowledged importance including water quality, natural habitats, important areas of landscape character, views and prospects, areas of geological interest or human health and residential amenity.'</p> <ul style="list-style-type: none"> In terms of Policy EX-O-1, the suggested amendments are considered to be reasonable and reflect the fact that this Objective relates to the extractive industry. <p>Recommendation: To amend Objective EX-O-1 as follows: (new text in blue and deletions in strikethrough)</p> <p>'To seek the conservation and protection of the environment in relation to extractive industries development conserve and protect the environment, including in particular, the archaeological and natural heritage, and conservation and protection of European designated sites and any other sites, which are prescribed.'</p> <ul style="list-style-type: none"> With regard to suggestions in relation to Objectives EX-O-2 and EX-O-3, it is considered that the wording of these objectives is reasonable and appropriate and indeed, provides clarification in that the

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			<p>only be considered in exceptional circumstances where the principles of the Department of Arts, Heritage, Gaeltacht and the Islands publication entitled, 'Framework and Principles for the Protection of Archaeological Heritage' can be satisfied.</p> <p>AH-P-3 It is the policy of the Council to protect the character, settings of and views from National Monuments and Recorded Monuments and to manage development which would be considered to (visually or physically) intrude upon or inhibit the enjoyment of the amenities of these sites.</p> <p>AH-P-4 It is the policy of the Council to protect where appropriate, the character and setting of any unrecorded archaeological object or site.</p> <p>AH-P-5 It is the policy of the Council to protect and preserve archaeological sites, their characters and settings which have been identified subsequent to the publication of the Record of Monument and Places.</p> <p>8. The submission also requests changes to Section 8.1 of the Draft CDP as follows (suggested text coloured blue and deleted text shown in strikethrough);</p> <p>Aim: (pg.124) To facilitate the appropriate and sustainable extraction of locally sourced aggregates and/or minerals that contribute to the local economy and ensuring that such activity does not significantly adversely affect issues features of acknowledged importance including water quality, natural habitats, important areas of landscape character, views and prospects, areas of geological interest or human health and residential amenity.</p> <p>9. The submission proposes changes to Objective EX-O-1 as follows (suggested text coloured blue and deleted text shown in strikethrough); "To seek the conservation and protection of the environment in relation to extractive industries development conserve and protect the environment, including in particular, the archaeological and natural heritage, and conservation and protection of European designated sites and any other sites, which are prescribed.</p> <p>10. The submission contends that the wording of Objective EX-O-2 is inappropriate in that it refers to 'preservation' of the landscape, which implies that there should be no change to landscape character whatsoever. The submission suggests changes to Objective EX-O-2 as follows (suggested text coloured blue and deleted text shown in strikethrough)-</p> <p>To assess and review the potential effects of extractive industries on landscape and to seek appropriate mitigation preserve the character of the landscape where and to the extent that,</p>	<p>preservation of the landscape is required 'where and to the extent that the proper planning and sustainable development of the area requires it' (EX-O-2). No changes to Objective EX-O-2 are recommended. Similarly, the wording of Objective EX-O-3 is considered to be reasonable and no changes are recommended in this respect.</p> <ul style="list-style-type: none"> The comment in relation to Policy EX-P-2 are noted. Given the sensitivity of extractive industry proposals in environmental and visual amenity terms, it is considered reasonable to adopt a precautionary approach with respect to such developments. The suggestion to simply include a requirement for Landscape and Visual Assessment would not in itself afford any protection to scenic areas in the County and as such it is not recommended that the Council pursue this approach; rather, an alternative text is suggested below. <p>Recommendation: It is recommended that Policy EX-P-2 be amended to reflect the precautionary approach of the Council in relation to such developments, as follows (new text shown in blue, deletions in strikethrough) -</p> <p>EX-P-2: It is a policy of the Council to adopt a precautionary approach in respect of new extractive industry proposals in areas of Especially High Scenic Amenity and in areas of High Scenic Amenity; such proposals will</p>

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			<p>the proper planning and sustainable development of the area requires it, including the preservation protection of identified views and prospects, cultural features and the amenities of places and features of natural beauty or interest. landscape character and visual amenity.</p> <p>11. The submission proposes changes to Objective EX-O-3, as follows (suggested text coloured blue and deleted text shown in strikethrough) -</p> <p>To seek the protection protect and preserve of the quality of the environment, in relation to extractive industries, so as to ensure no significant adverse effects. Measures may include ing the prevention, limitation, elimination, abatement or reduction of environmental pollution and the protection of waters, groundwater, the seashore and the atmosphere.</p> <p>12. The submission contends that Policy EX-P-2 is unclear in its reference to 'new extractive industries' and whether this term applies to the expansion of existing operations. It is suggested that a blanket ban on extractive industry in EHSA areas is inappropriate. The submission also states that the requirements of the Habitats Directive relate to 'significant' effects on Natura 2000 sites. The submission suggests changes to Policy EX-P-2 as follows (suggested text coloured blue and deleted text shown in strikethrough) - "It is a policy of the Council not to permit to require Landscape and Visual Impact Assessments in respect of new extractive industry proposals in areas of Especially High Scenic Amenity or in areas of High Scenic Amenity. Furthermore, such proposals will not normally be permitted where they would significantly adversely impact upon any Natura 2000 site, Natural Heritage Area, Nature Reserve, Groundwater Protection Area (Aquifer), Freshwater Pearl Mussel Catchment or other areas of importance for the protection of flora and fauna, or areas of significant archaeological potential, unless it can be clearly demonstrated that such extractive industries would not have significant adverse impacts on amenities or the environment, and comply with Article 6 of the Habitats Directive. All extractive industry proposals in designated Freshwater Pearl Mussel Catchments will be subject to a Habitats Directive Assessment and will comply must comply with the objectives and practices set out in the relevant Freshwater Pearl Mussel Sub-basin Plan, and any relevant codes of practice."</p> <p>13. The submission contends that, whilst progressive restoration of sand and gravel quarries is generally feasible, progressive restoration of hard rock quarries is generally not undertaken owing to the difficulties of restoring an operational site, the nature of extraction methods and the design of such quarries. With this in mind, changes to Policy EX-P-4 are suggested as follows (suggested text coloured blue and deleted text shown in strikethrough) - "It is a policy of the Council to require all applications for extractive industry proposals to be accompanied by an integrated phased development extraction plan and a restoration plan for and aftercare plan. Use of the site. Any restoration plan must comply with Article 6 of</p>	<p>not be permitted where they would adversely impact upon the character and amenities of such areas. Furthermore, extractive industry proposals will not normally be permitted where they would significantly adversely impact upon any Natura 2000 European site, Natural Heritage Area, Nature Reserve, Groundwater Protection Area (Aquifer), Freshwater Pearl Mussel Catchment, or other areas of importance for the protection of flora and fauna; or areas of significant archaeological potential, unless it can be clearly demonstrated that such extractive industries would not have significant adverse impacts on amenities or the environment, and would comply with Article 6 of the Habitats Directive. All extractive industry proposals in designated Freshwater Pearl Mussel Catchments will be subject to a Habitats Directive Assessment and will must comply with the objectives and practices set out in the relevant Freshwater Pearl Mussel Sub-basin Plan, and any relevant codes of practice.</p> <ul style="list-style-type: none"> • In terms of the suggestion that Policy EX-P-4 should be amended on the basis that it is not always feasible to progressively restore all quarries; Policy EX-P-4 is considered to be reasonable and appropriate in the context of protecting the amenities of areas wherein extractive industries are located. The policy as drafted is not prescriptive in terms of the contents of restoration plans and as such there is scope for developers to formulate appropriate restoration proposals

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			<p>the Habitats Directive and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of a Natura 2000 site. Restoration plans should comply with the following policies EX-P-1 and EX-P-2 and objectives EX-O-1, EX-O-2 and EX-O-3.”</p> <p>14. As suggested earlier, the submission again notes that the ‘setting’ of monuments is not addressed in national guidance. As such, changes to Policy EX-P-5 are suggested as follows (suggested text coloured blue and deleted text shown in strikethrough) - “It is a policy of the Council to require that, where an extractive industry development is proposed within 300m of a recorded monument/archaeological site or is likely to have a material impact on the visual amenities of the monument/site, the applicants/operators shall engage the services of an archaeologist or suitably qualified person to undertake archaeological assessment of the site. This assessment to be submitted in full with the planning application for the development.”</p> <p>15. The submission notes that Policy EX-P-6 requires operators to upgrade approach roads to extractive industry developments at their own expense. However, it is contended that Development Contribution Schemes generally address such matters. It is further contended that no similar obligation appears to be placed on other forms of development in the county. Changes to Policy EX-P-6 are therefore suggested as follows (suggested text coloured blue and deleted text shown in strikethrough) - “It is a policy of the Council to require that development proposals for extractive industries are accompanied by evidence of the suitability of the road network in terms of width, alignment and carrying capacity and to require that any identified deficiencies can be addressed at the applicant’s expense. Where mitigating works are required to upgrade or realign roads infrastructure, they must comply with Article 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of a Natura 2000 site, and will comply with the objectives and practices set in any relevant Freshwater Pearl Mussel Sub-basin Plan, and any relevant codes of practice, insofar as reasonably possible taking into consideration the safety of the future road users.”</p> <p>16. The submission notes that a list of County Geological Sites is included in the SEA (Appendix D). However, it is contended that the extents of these sites are unclear and suggested that the sites should be properly mapped (within the main body of the CDP) to allow landowners, developers and planning authority officials to have a clear understanding of the site extents. It is suggested that the CDP should acknowledge that quarry operations are not incompatible with the preservation of geological heritage and that Policy G-P-1 should be amended as follows (suggested text coloured blue and deleted text shown in strikethrough)</p>	<p>based on individual site characteristics. No recommendations to this policy are recommended.</p> <ul style="list-style-type: none"> • With regard to the suggested amendments to Policy EX-P-6, it is considered that the heavy-laden vehicles typically associated with extractive industries have the potential to place considerable pressure on roads infrastructure. It is therefore considered appropriate that roads are upgraded where necessary to the standard required to cater for these heavy vehicles, and that the developer be responsible for such upgrade works, which will ultimately benefit the operation of the quarry/associated development. No amendments to Policy EX-P-6 are recommended. • In terms of comments and suggestions relating to Policy G-P-1, the wording of Policy G-P-1 is considered to be entirely appropriate and affords the necessary degree of protection to these important sites, as opposed to merely protecting their educational value. No amendments to Policy G-P-1 are recommended.

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			<p>-</p> <p>"It is a policy of the Council to protect the educational value of County Geological Sites (CGS). Accordingly the Council will adopt a precautionary approach to development proposals with the potential to impact upon a CGS. Proposals in relation to CGS should be accompanied by an detailed report from assessment prepared by a competent person that sets setting out proposed measures to retain relevant features of educational value the potential impact to ensure that an informed decision can be made. Where significant harm to the CGS is deemed likely, planning permission will not be granted unless there are overriding considerations of public importance to the County."</p>	
P214	Canavan Associates Ltd	Michael McLaughlin	<p>This submission was lodged by by Michael Mclaughlin of Canavan Associates Ltd. and relates to wind energy.</p> <ol style="list-style-type: none"> 1. The submission requests that the restrictive policy on wind energy development be amended in order to allow for home generated renewable energy to combat climate change, save on imported fossil fuels and provide an economic benefit to deprived rural areas. 2. The submission requests the deletion of constraints set out in Section 8.2 of the Draft CDP and the allowance of a setback distance between residential properties and turbines of 4 x blade height. 3. The submission also raises the issue of Fresh Water Pearl Mussel catchment areas and questions how these designations seem to prohibit wind energy development but not other forms of development (such as roads, quarries, housing etc.) – it is suggested that this approach is discriminatory against the wind energy sector and that such matters could be addressed via scientific environmental impact studies. 4. The submission requests that the previous zoning map of 2014 be re-instated as the draft Energy map 8.2.1 has almost no land provided for new wind energy projects and sterilises the renewable secto. 5. It is suggested that the hostile approach to wind energy in the Draft CDP contravenes National Government and European policies. 	1. to 5. Refer to themed response on renewable energy contained in section 3.7 of this report.
P215		Antoinette	This submission was lodged by Antoinette Doherty and relates to wind energy.	1. & 2. Refer to themed response on renewable

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		Doherty	<ol style="list-style-type: none"> 1. The submission is supportive of the 10 x tip height setback distance between residential properties and wind turbines. 2. The submission also requests that companies should be required to apply for an entire 'windfarm' rather than submit incremental proposals for smaller numbers of turbines. 	energy contained in section 3.7 of this report.
P216	Canavan Associates Ltd	Ulrike Kuhlmann	<p>This submission was lodged by Ulrike Kuhlmann of Canavan Associates Ltd. and relates to Wind Energy.</p> <ol style="list-style-type: none"> 1. The submission requests that the restrictive policy on wind energy development be amended in order to allow for home generated renewable energy to combat climate change, save on imported fossil fuels and provide an economic benefit to deprived rural areas. 2. The submission requests the deletion of constraints set out in Section 8.2 of the Draft CDP and the allowance of a setback distance between residential properties and turbines of 4 x blade height. 3. The submission also raises the issue of Fresh Water Pearl Mussel catchment areas and questions how these designations seem to prohibit wind energy development but not other forms of development (such as roads, quarries, housing etc.) – it is suggested that this approach is discriminatory against the wind energy sector and that such matters could be addressed via scientific environmental impact studies. 4. The submission requests that the previous zoning map of 2014 be re-instated as the draft Energy map 8.2.1 has almost no land provided for new wind energy projects and sterilises the renewable sector. 5. It is suggested that the hostile approach to wind energy in the Draft CDP contravenes National Government and European policies. 	1. to 5. Refer to themed response on renewable energy contained in section 3.7 of this report.
P217		Anne McMenamin	<p>This submission was lodged by Anne McMenamin and relates to wind energy</p> <ol style="list-style-type: none"> 1. The submission states that the 10 x tip height setback requirement between residential properties and wind turbines should be carried forward into the new County Development Plan to protect those living nearby. The submission cites the example of Bavaria and Poland and states that a 10 x tip height setback and 2km setback are 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. 2. Refer to themed response on renewable energy contained in section 3.7 of this

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>required in these locations, respectively.</p> <ol style="list-style-type: none"> 2. The submission refers to areas within the County that have been deemed as 'Not Acceptable' for wind energy development and requests that these designations be held and in particular that the Finn Valley, including lands within the Cashelnavern Border and Uplands LCA and the Finn valley LCA be zoned unacceptable for Wind farm Development, for reasons including potential loss of biodiversity in the event that wind energy development were to be allowed. 3. The submission is supportive of 'option 3' proposed by Councillor Campbell in relation to wind energy policy. 4. The submission contends that existing windfarms nearing the end of their useful life should be upgraded before new windfarms are permitted. 5. The submission states that large turbines have a significant visual impact together with shadow flicker. 6. The submission raises the issues of noise in quiet rural locations as well as property devaluation arising as a result of wind turbines. 7. The submission raises concerns in relation to potential flooding that might occur as a result of tree clearing for windfarm construction. 	<p>report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report</p> <p>3. to 7. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>
P218	Brookfield Renewable	Claire Deasy	<p>This submission was lodged by Brookfield renewable and relates to wind energy.</p> <ul style="list-style-type: none"> ▪ The submission provides a backdrop on Brookfield Renewable, who have 2 windfarm sites in Donegal (Flughland and Sorne Wind Farm) totalling 48.1MW. ▪ The submission welcomes the overall strategic objectives within the Draft Plan but raises serious concerns regarding the proposed 10 x tip height setback requirement between residential properties and turbines, which is stated to be contrary to the 2006 Wind Energy Guidelines and 4 x tip height setback requirement as outlined in the 'preferred Draft approach'. 	<p>1. & 2. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p> <p>3. to 12. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> <li data-bbox="607 316 1581 603"> <p>▪ The submission also expresses disappointment with the following:</p> <ul style="list-style-type: none"> -Rezoning of lands previously zoned as 'Open for Consideration' to 'Not acceptable' -Rezoning of areas previously zoned as 'Open for Consideration' to 'Acceptable for augmentation/improvements to existing windfarms', which effectively precludes 'new' schemes. -The policy to the effect that proposals for repowering shall not be allowed to result in a net increase in turbines. -The proposal to restrict extensions to existing windfarms, such that the numbers of new turbines will not be allowed to exceed 20% of the number of existing turbines, or in cases where 5 or less turbines are permitted, one additional turbine. <li data-bbox="607 667 1581 746"> <p>▪ The submission states that the net effect of the restrictions will be to effectively preclude future Greenfield wind energy development in Donegal and further questions what objective scientific evidence was relied upon to inform these decisions.</p> <li data-bbox="607 810 1581 890"> <p>▪ The submission provides arguments in relation to the need to deploy more renewable energy in order to meet agreed targets and avoid the imposition of fines for not meeting said targets.</p> <li data-bbox="607 954 1581 1034"> <p>▪ Brookfield are of the opinion that Section 6.5 (f), Part B, Appendix 3 is not in compliance with national policy and is proposed without a credible, scientific evidence base.</p> <li data-bbox="607 1098 1581 1241"> <p>▪ The submission questions the evidence and approach of the 'Non-executive report' submitted to the Council in relation to wind energy that included references to noise. The submission states that this report has not been disclosed, nor its contents described or author named. Brookfield request that this report be circulated to the public to allow an assessment of the evidence.</p> <li data-bbox="607 1305 1581 1385"> <p>▪ The submission also questions the EU court of Justice case reference C-142/16. Brookfield Renewable state that this case dealt with fish migration on the River Elbe and that no reference to residential amenity (noise/visual) was made in this case.</p> 	<p data-bbox="1615 252 2134 395">13. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p> <p data-bbox="1615 427 2134 507">14. to 16. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>Brookfield question the strength of this material in leading to the drastic change in terms of setback requirements.</p> <ul style="list-style-type: none"> ▪ The submission notes that 2 separate reports are referenced on page 128 of the Draft Plan and are used to support the proposed 10 x tip height setback requirement (1. 'Examination of the Significance of Noise in Relation to Onshore Wind Farms', Marshall Day Acoustics and 2. 'Preliminary Report on Wind Turbines Noise Modelling', RPS). However, it is contended that the same reports have been used in the preparation of the 'preferred draft approach' for the new wind energy guidelines, which recommend a 4 x turbine height setback. Brookfield Renewable fail to see how the same reports could be interpreted so differently by two bodies. ▪ Brookfield request that Section 6.5(f.) of Part B, Appendix 3 and any other reference to the 10 x tip height setback be deleted, as such references are not in compliance with national policy and the evidence provided to support such a departure is insufficient. ▪ Brookfield have serious concerns in relation to the reduction in the amount of land 'open to consideration' for wind energy development. ▪ Brookfield view the the inclusion of policies/areas that are only 'acceptable for augmentation of/improvements to existing windfarms' as overly onerous and unnecessary; stating that there is untapped potential for new wind energy development in these areas. Brookfield request that this category be deleted and that these areas revert back to 'open to consideration'. ▪ In the event that the Council retain the 'augmentation' category, Brookfield suggest that the text in Policy EP-P-12 (specifically the section concerning 'reapplication') be amended as follows (suggested text coloured blue) - "in areas located outside of Natura 2000 sites, where an existing wind farm has been permitted and this permission has expired, or refused based on inadequate information, a revised proposal will be considered within the planning unit of the previously permitted development, and where it is demonstrated that there is no net increase in turbines." It is suggested that potential sites within these areas could then be assessed on a case- 	

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			<p>by-case basis.</p> <ul style="list-style-type: none"> ▪ The submission requests that the DRAFT Map 8.2.1 be removed and a new process commenced whereby clear scientific evidence is given for revising previous zonings in the county; or alternatively that the previous original map (i.e. map prior to variation No. 2) be reinstated. ▪ The submission refers to community engagement in the context of wind energy developments and states that the industry supports this approach. The submission provides descriptions of community benefit initiatives that Brookfield have been involved with in Donegal. ▪ The submission provides figures in terms of rates payments by Brookfield in Co. Donegal. 	
P219	JJ Campbell & Associates Civil and Structural Engineers	John Campbell	<p>This submission was lodged by JJ Campbell and Associates and relates to renewable energy</p> <ol style="list-style-type: none"> 1. JJ Campbell and Associated are currently working with Wave Energy Ireland Ltd. to develop technology to capture power from ocean waves. It is contended that such technologies (Ocean/Wave) are still in their research and development stage and as such consideration should be given to the development of other proven sources of renewable energy. 2. The submission requests areas that a 'Preferred Zoning' be identified for wind energy developments, i.e. areas where windfarms would be 'acceptable in principle'. 3. The submission requests that the Draft Plan reconsider the position in respect of areas zoned 'Acceptable for Augmentation of/Improvements to existing windfarms' and suggests that these areas should instead be zoned 'Acceptable in principle' within the normal meaning of this term. 	1. to 3. Refer to themed response on renewable energy contained in section 3.7 of this report.
P220	Finn valley Wind Action	Marie Scanlon	<p>The submission was lodged by Finn Valley Wind Action Group and relates to renewable energy policy.</p> <ol style="list-style-type: none"> 1. The submission states that the Finn Valley area is currently zoned as unfavourable for 	1. to 15. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>windfarm development and the submission supports this zoning.</p> <ol style="list-style-type: none"> <li data-bbox="607 312 1603 427">2. The submission refers to a 'Strategic Infrastructure' application for 49 No. turbines in the Finn Valley area, which was ultimately refused by An Bord Pleanála on 23rd March 2016. The submission contends however, that the developer in that case intends to resubmit an application for planning permission for 37 No. turbines. <li data-bbox="607 491 1603 689">3. The submission references a Government white paper entitled 'Ireland's Transition to a low Carbon energy Future 2015-2030' and states that this document is aspirational and does not provide any scientific evidence as to how renewable energy targets can be achieved. It is contended that the policies contained in the white paper have not been subject to a cost benefit analysis (CBA) or Strategic Environmental Assessment (SEA) and that if these assessments had been carried out, it would be clear that Donegal does not have the land mass to sustainably accommodate more windfarms. <li data-bbox="607 753 1603 810">4. The submission provides an argument to the effect that diversification is required and that other renewable energy technologies need to be explored. <li data-bbox="607 874 1603 1104">5. The submission refers to the 'East West interconnector between Ireland and the UK and contends that this interconnector was taken out of commission in September 2016, resulting in a request by Eirgrid for windarms to stop producing electricity at certain times as it could not be exported – as a consequence, it is alleged that wind farm operators had to be compensated, with the bill being picked up by consumers. The submission contends that this in itself demonstrates that the optimum levels of onshore wind penetration to the Irish Grid system have already been achieved. It is contended that 'repowering' should be pursued as a means of optimum energy production. <li data-bbox="607 1168 1603 1225">6. Finn Valley Wind Action Group are in favour of the 10 x tip height setback requirement imposed by Donegal County Council. <li data-bbox="607 1289 1603 1394">7. The submission cites WHO recommended maximum noise levels of 40dBa and compares this standard to the 43dBa maximum limit recently suggested by the Government. The submission references an SEAI study in relation to noise and suggests that a 1200m set back distance would be required to achieve a 40dB(A) noise 	<p>this report.</p>

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			<p>level at properties in the vicinity of windfarms. The submission contends that even a 40dB(A) limit would be excessive and refers to cases of families having to abandon their homes due to noise from wind turbines.</p> <p>8. The submission refers to 'Shadow Flicker' and contends that a 4 x tip height separation distance would not be sufficient to alleviate this issue and that management of this phenomenon using technology would not be practical. It is further contended that, if controls on noise and shadow flicker are necessary (and thus reduce the performance of the turbine), then a proposed wind energy development affected by such controls should not be considered environmentally friendly and would not make economic sense.</p> <p>9. The submission raises the issue of Low Frequency Noise (LFN) and infrasound caused by turbines and suggests that possible adverse effects on human health may arise as a result of this phenomenon.</p> <p>10. The submission refers to the Cashelnavern LCA and queries the rationale for the divide between said LCA and the Finn Valley LCA. It is contended that the LCA fails to accurately identify the number of dwellings within the Cashelnavern LCA. The submission contends that there in excess of 320 turbines already built or permitted within a 20km range of this area, in addition to proposals for a further 86 between the Republic and N. Ireland.</p> <p>11. The submission refers to the importance of tourism in the area and contends that wind energy developments in the area would be visually intrusive and would be detrimental to the tourism sector.</p> <p>12. The submission raises concerns in relation to the protection of watercourses and catchments and contends that Objectives WES-O-4 and WES-O-5 conflict with Policy E-P-12 in that windfarms are 'open to consideration' within some of the most important surface water catchments in the County, including the catchment for Lough Mourne and the Pollan Dam catchment. It is suggested that greater priority should be given to protection of water sources/catchments where wind energy development is concerned.</p>	

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			<p>13. The submission raises concerns in relation to peat slippage, the potential for increased flooding and the potential adverse effects on flora, fauna and hydrology that may arise as a result of such events.</p> <p>14. The submission raises concerns in relation to potential impacts on wildlife including bird species as a result of wind energy development. The submission requests that Donegal County Council (DCC) refrain from further changing the fabric of the upland landscape in order to protect bird species.</p> <p>15. The submissions concludes by noting that DCC has a duty of care to the people and requests that 'Option 3 Revised' be implemented in respect of wind energy policy. It is contended that the 10 x tip height separation requirement will help safeguard homes and communities. The submission notes that the community in this area are completely opposed to 'community benefit' being attached as a condition of planning for the permission of windfarms.</p>	
P221	Reid Associates Planning Development Consultants	Ann Mulcrone	<p>The submission has been lodged by Reid Associates on behalf of Viv Guinness, Giancarla Alen-Buckely and Michael-Alen Buckley and relates to wind energy.</p> <ul style="list-style-type: none"> ▪ The submission requests amendments/changes to the Draft Development Plan 2018-2024, inclusive of amendments to and omission of certain policies and objectives relating to wind energy. <p>1. Part A, Appendix 1, Legal Interpretation and Planning Policy Context S1.2 - The submission requests omission of the reference to Wind Energy Development Guidelines 2006 in last bullet point of Planning Policy Context as it is contended that said Guidelines are out of date, and ineffective in terms of assessing environmental impacts on the landscape. Also, the inclusion of reliance on Wind Energy guidelines 2006 provides for deference to the guidelines, contrary to the EIA Directives 85/337/EEC, 97/11/EC, 2009/31/EC, 2011/92/EU and 2014/52/EU. The submission also states that the guidelines were never subject to SEA and as such contravenes the SEA directive 2001/42/EC.</p> <p>2. It is suggested that any reliance in the County Development Plan on the Wind Energy Development Guidelines 2006 would undermine the legality of the Development Plan.</p>	1. to 25. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>3. The submission requests that all references to the Wind Energy Development Guidelines 2006 be deleted from the Draft Plan.</p> <p>4. Part A, Appendix 2, S28 Statement in relation to the Draft Donegal Development Plan 2018-2024 – The submission notes the contents of the 'Section 28' statement in relation to the Draft Plan and suggests that from this statement, it is clear that there is no democratic or community support for promotion of wind energy throughout the county. In this context, it is contended that the inclusion of 'positive' policy for wind energy (as set out under Section 8.1 of the Draft and mapped on Map 8.2.1) would undermine and fetter public consultation and participation such that it would be meaningless and contrary to the Aarhus Convention. The submission requests the deletion of paragraphs 1,2 and 3 of the Section 28 statement and proposes detailed replacement text which effectively suggests a moratorium on wind energy development in the county on the basis of, inter alia, the scale and extent of the existing wind farm capacity in the county and the scale of oversupply of generating capacity nationally.</p> <p>5. The submission requests the amendment of the wind energy policy as outlined under Section 8.2 of the Draft and the omission of wind energy map 8.2.1. The submission recommends that Section 8.2.1 include a phrase to the effect that upgrades to the existing electricity transmission network should 'be underground to avoid visual amenity impacts'.</p> <p>6. The submission suggests additional text to be included into Section 8.2.1, making reference to, inter alia, 'curtailment payments' that have to be made to windfarm companies during times when high wind speeds could result in an excess amount of energy overloading the grid and thus necessitate turbine shutdown. The submission contends that the reduction in carbon emissions from further wind energy generation are limited as the country continues to burn coal and peat in power stations to allow for periods of low wind. The suggested text also refers to the limited capacity of grid infrastructure, and the need for in-depth monitoring of existing cumulative impacts of windfarm development to date. The suggested text also includes a statement to the effect that a moratorium will be placed on windfarm development over the lifetime of the County Development Plan.</p> <p>7. The submission requests the omission of the following text on page 128 of the Draft</p>	

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			<p>Plan – ‘...in accordance with E-P-12, Map 8.2.1 and 'Wind Energy' section of Appendix 3, Development Guidelines and Technical Standards, Part B, Objectives and Policies of the Plan, the Plan identifies the following policy/zoning areas for consideration of proposed new wind farm developments, and alterations to existing wind farms within the County. (1) 'Open to Consideration': Within these locations, wind farm developments are open to consideration, subject to compliance with other objectives and policies of the Plan. These areas are open to consideration for appropriate wind energy proposals. They have been identified having regard to a range of factors, including wind energy potential (through the wind speed atlas www.seai.ie), existing grid connections, proposed grid connections, natural heritage designations and landscape sensitivity, road infrastructure and where potential conflict with natural heritage designations may be managed effectively (2) 'Acceptable for augmentation of/improvements to existing windfarms': Within these locations, wind farm development would be unacceptable save as augmentation of, or improvements to, existing wind farm development subject to compliance with all other objectives and policies of the Plan. The Council recognises the opportunities arising from the use of more efficient turbines on established windfarms, as they generate much higher energy yields per turbine, thereby reducing the need for additional turbines. In most cases the infrastructure, roads, hardstand, turbines, sub station and fences have already been established, so there should be limited additional impact. Wind energy developments within these areas will be considered subject to compliance with all other objectives and policies of the Plan.'</p> <p>8. The submission contends that wind farm developments do not appear to be subject to any in depth monitoring and suggests that, in the absence of such monitoring it is not possible to identify appropriate environmental standards for protection of existing amenity.</p> <p>9. The submission notes the extremely scenic nature of the county and contends that the inclusion on the wind energy map 8.2.1 of areas 'open to consideration' or acceptable for 'augmentation' is unsustainable in itself given the importance of the landscape scenic amenity value.</p> <p>10. The submission requests amendments to Objectives as follows (new text shown in blue, deletions shown with strikethrough) –</p> <p>Objective E-O-2 To facilitate the strengthening of the electricity grid to enable the harnessing and distribution of energy. The Council will support transboundary and</p>	

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>trans-national interconnectors to enable the exporting of energy outside of the County as long as grid connections and transmission interconnectors are underground.</p> <p>Delete Objective E-O-5 as currently drafted and replace with following text – To impose a moratorium on wind energy development in order to monitor impacts of existing wind farms on local residential amenity, landscape and tourism and the environment, flora and fauna and protected species and habitats and undertake assessment of the cumulative impact of wind farms on the landscape character of the County and on land use.</p> <p>Amend Objective E-O-6 as follows - To ensure that wind energy developments do not adversely impact upon the existing residential amenities of residential properties, and other centres of human habitation (as defined at Para. 6.6, 'Wind Energy', Appendix 3, Development Guidelines and Technical Standards, Part B, Objectives and Policies of the Plan).</p> <p>11. Amend policies as follows (new text shown in blue, deletions shown with strikethrough) –</p> <p>Policy E-P-1 It is policy of the Council to facilitate the development of grid reinforcements including grid connections and transboundary energy network (Electricity and gas) into and through the County and between all adjacent counties and to support the development of cross border grid connections, subject to their implementation on an underground basis and in compliance with other objectives and policies of this Plan.</p> <p>Policy E-P-2 It is a policy of the Council to facilitate the appropriate development of renewable energy from a variety of sources, including, hydro power, ocean energy, bioenergy, solar, wind and geo-thermal and the storage of water as a renewable kinetic energy resource, in accordance with all relevant material considerations and the proper planning and sustainable development of the area.</p> <p>12. The submission suggests changes to the text on pg. 131 as follows 'As well as implementing the undernoted policy framework, the Council will also encourage all wind renewable energy developers to engage in pre-planning consultation with the Planning Authority in relation to development proposals.</p> <p>13. The submission requests that Policy E-P-10 be omitted on the basis that the Wind Energy Development Guidelines for Planning Authorities 2006 are out of date and no longer appropriate for guidance of major wind farm development.</p>	

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>14. The submission requests the amendment of Policy E-P-11 as follows – It is a policy of the Council to consider the development of renewable energy, through the development of on-offshore wind energy proposals, in accordance with the proper planning and sustainable development of the area. Donegal's historic coastline is of outstanding international beauty and importance and was fundamental to Donegal being cited as the "coolest place on the planet" (Lonely Planet). Therefore the suggestion of promoting or even considering offshore wind energy development would significantly compromise and disaffect the amenity of the coastline and its setting.</p> <p>15. The submission requests the deletion of Policy E-P-12 and its replacement with the following text - It is the policy of the Council to impose a moratorium on the development of any further new wind energy developments within the County whether on shore or offshore.</p> <p>16. The submission requests the omission of Policy E-P-13 on the basis that cooperative and community windfarms have not been resourced to participate in the planning process and policies encouraging windfarm development in areas of scenic amenity have the potential to divide communities.</p> <p>15. The submission requests the amendment of Policy E-P-15 as follows – It is the policy of the Council to support and facilitate, appropriate on site wind energy development by auto producers/micro producers* where energy generated is primarily required to meet the immediate needs of the development, whether community/ agricultural and/or small enterprise, subject to compliance with all other relevant objectives and policies contained within this plan. The Wind Energy Map 8.2.1 does not restrict the location of turbines for the purposes of auto-production. *(see definitions at end of chapter)</p> <p>16. The submission requests the amendment of Policy E-P-15 as follows – It is a policy of the Council to monitor all existing wind farm, to assess the local environmental</p>	

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>capacity.</p> <p>17. The submission requests the omission of Policy E-P-19 having regard to the level of existing windfarm development and the need for monitoring of said developments to form an evidence base going forward.</p> <p>18. The submission requests that Policy E-P-21 be amended as follows - It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required and shall be underground.</p> <p>19. The submission requests that Objective ED-O-9 be replaced with the following text – Development of renewable energy resources should be linked and integrated with the core land use strategy and provide for direct local community benefit and involvement while avoiding adverse impacts on human health, environmental, heritage, amenity objectives and designations of the development plan.</p> <p>20. The submission requests that Policy NH-P-6 be amended as follows - It is a policy of the Council to protect areas identified as Especially High Scenic Amenity on Map 7.1.1: 'Scenic Amenity'. Within these areas, only developments assessed to be of strategic importance except for excluding wind farm development or developments that are provided for by policy elsewhere in this Plan and can demonstrate avoidance of adverse impact on scenic amenity shall be considered.</p> <p>21. The submission requests that Policy NH-P-15 be amended as follows - It is a policy of the Council to safeguard prominent skylines and ridgelines from all development.</p> <p>22. Part B Appendix 3 Development Guidelines and Technical Standards The submission requests amendment of section 1 to omit reference to the Wind Energy Development Guidelines 2006.</p>	

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>23. The submission requests amendments to Part B Appendix 3, Sections 6.4 and 6.5, as follows –</p> <p>6.4 All grid cable connections within the site and external to the site should be undergrounded.</p> <p>6.5 Wind turbines must meet the requirements and standards set out in the DEHLG Wind Energy Development Guidelines 2006, or any subsequent related Guidelines and in addition must not be located within: (a) The zone of visual influence (ZVI) of the Glenveagh National Park. (b) The zone of influence/flight path at Donegal Airport. (c) Areas identified as locations where wind farm development would not be acceptable as identified on the scenic amenity map as especially high amenity, high amenity or moderate high amenity map 8.2.1, chapter 8 of the County Development Plan 2018-2024. (d) Special Areas of Conservation (SACs) nor Special Protection Areas (SPAs) (e) The 6 Fresh Water Pearl Mussel (S.I. 296 of 2009) catchments contained in the Freshwater Pearl Mussel Sub-Basin Management Plans for Clady, Eske, Glaskeelin, Leannan, Owencarrow and Owenea. (f) A set back distance of ten times the tip height of proposed turbines from residential properties and other centres of human habitation.</p> <p>24. The submission contends that the Environmental Report fails to identify the impacts of windfarms on human health as an issue. In addition, it is contended that the impacts of windfarms on noise has not been included and that the interrelationships of the impacts of windfarms on a wide range of issues such as material assets, water, soil, flora etc. have not been properly examined or identified. Mitigation measures are therefore deemed to be inadequate.</p> <p>25. The submission states that the mitigation measures contained in the Natura Impact Statement are inadequate and that a moratorium on wind farm development is necessary.</p>	
P222		Danny McNamee	<p>1. The submission is made by Danny McNamee and relates Wind Energy. The submission requests that the restrictive policy be amended in order to provide home generated renewable energy to combat climate change, save on imported fossil fuels and provide an economic benefit to deprived rural areas. The submission requests the deletion of constraints set out in Section 8.2 and allow the set back distance of 4 x tip height. The submission also raises the Fresh Water Pearl Mussel catchment areas and questions how this prohibits wind energy but not other development and as such is discriminatory. The submission requests that the previous zoning map 2014 be re-instated as the draft Energy</p>	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

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			map 8.2.1 has almost no land provided for new wind energy projects and sterilises this renewable sector and contravenes National, government and European policies.	
P223		Michael McClafferty	<ol style="list-style-type: none"> 1. Submission demands that all planning fees for local people be free. 2. Submission demands that section 47 be brought back to allow young people to build in rural Ireland unchallenged. 3. Submission suggests that all NI holiday homes be occupied all year round or charged €50,000 at planning stage, to ensure equality in all areas. 4. Submission states that fast track planning should apply to Donegal as it does to Dublin. 5. Submission requests 1 bus shelter in every rural town in Ireland. 6. Submission sets out a need for at least 6 wheelchair spaces in every town. 7. Submission sets out a need for local transport for all and adapt at least one bus/ vehicle to be wheelchair friendly. 8. Submission supports new windfarms providing a return of revenue in the area they are situate. 9. Submission states there is a need to tarmac back roads, not tar and chip for reasons of durability and cost. 10. Submission states a need for proper vehicles appointed to all Garda stations. 	1. to 10. Comments noted – however, the matters raised are outside the remit of the Draft CDP.
P224		David Tourish	<ol style="list-style-type: none"> 1. Submission relates to alleged public health effects on a family member as a result of living alongside windfarms, and refers to symptoms of the affected person. Submission cites recent research that has been carried out on the health impacts of infrasound and low frequency sounds that show legitimate and unarguable health symptoms linked to exposure of low frequency noise. 2. Submission request that DCC seriously consider further independent research prior to the development of any further windfarms. 	1. & 2. Refer to themed response on renewable energy contained in section 3.7 of this report.
P225		Noel O'Donnell	<ol style="list-style-type: none"> 1. Submission supports the issues raised in submission no.266 regarding the impact of windfarms on communities. 2. Submission states that windfarms are driving people away from rural communities and is concerned that his (7) children will leave the area and not continue to farm the land. 3. Submission requests that DCC do not consider further windfarm applications or at least uphold the current variation that provides for a minimum of 10x the tip height from residential properties. 	1. to 3. Refer to themed response on renewable energy contained in section 3.7 of this report.
P226		Monica O'Donnell	<ol style="list-style-type: none"> 1. Submission requests that DCC reconsider wind energy as a viable source of green energy for the reasons listed below: <ul style="list-style-type: none"> ▪ Causes an adverse effect on communities, tourism, recreation, agricultural sector and property value. ▪ Donegal has more than its fair share of windfarms. 	1. to 7. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ Windfarms were permitted without any research on the impacts to humans, animals and the environment. (likenes this to the tobacco and asbestos industries). <ol style="list-style-type: none"> 2. Submission requests that DCC look unfavourably on Wind farm applications in the future for reasons stated below: <ul style="list-style-type: none"> ▪ The county's greatest asset is its largely unspoilt rural landscape, with the capacity to attract tourists and thereby revenue and jobs. ▪ Publicity generated by the National Geographic's latest edition on 'the coolest place on the planet' should be harnessed and built upon and not jeopardised by plotting windfarms on rural landscapes. ▪ Survey by the Mountaineering Council of Scotland found that 2/3 of people said turbines made Scotland a less appealing place to visit. ▪ A survey carried out on behalf of Failte Ireland in 2012 found that almost ¾ of the people surveyed said potentially greater windfarms would have no impact on their likelihood to visit again; those for were ion support of renewable energy and fewer carbon emissions whilst those against were more likely to cite they looked ugly, are noisy and can frighten or damage wildlife. Tourist tended to prefer smaller windfarms, and in light of this the submission queries the proposal for augmentation of the windfarm at Cark, Meetycat and area that could have a possible detrimental effect on tourism. Submission argues that the numbers not opposed to windfarm development in the survey were ill-informed on the economic viability of wind power generation. ▪ A back up power supply is required to operate windfarms. ▪ The aim of producing 40% of the Country's energy from renewables by 2020 is unachievable. ▪ DCC has a duty to protects its citizens and there is an adverse effect on the people that live in the vicinity of windfarms. 3. Submission claims that people in Donegal have been misled and misinformed from the initial introduction of windfarms to Cark and that the community has suffered unknown health risks and devaluation of property, referring to recent research on this matter. 4. Submission states that the national 'wind Energy Guidelines' are unacceptable as they don't recognise or measure low frequency sound particularly infrasound, and this is recognised in An Bord Pleanála's' Inspectors report on the proposed windfarm at Straboy, Glenties. 5. Submission references a number of international research projects regarding the potential detrimental effect of infrasound. 6. Submission states that 'Health', according to the World Health Organisation is a basic human right and queries where the Department of Health stand on this. 7. Submission states that recent research is too late for existing windfarms but requests that DCC take responsibility for allowing windfarms so close to residential properties as the county have contributed enough to national targets for wind generated energy. 	
P227		Edward and	1. Submission supports the proposed zoning of lands from Barnes to Castlefin as unsuitable for	1. & 2. Refer to themed response on renewable

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
		Kathleen Byrne	<p>wind farm development for reasons of:</p> <ul style="list-style-type: none"> ▪ Refusal by An Bord Pleanála in the area of Cashelnavern LCA. The threat of the windfarm had negative effects on the community and the developer has placed a pre-application submission to An BP. ▪ There was no cross border consultation for wind turbines in NI, Co. Tyrone that are visible from his home. ▪ Request that community is protected and the proposed unsuitable designation be upheld in the final version. ▪ 10x hip height is most important and national guidelines of 500m is inadequate as tip height proposed for this area was 156.3m. ▪ Request the outcome of the High Court challenges by Cllr John Campbell be carried out in the new plan. <p>2. Submission states that it in their opinion Donegal has been destroyed by the number of windfarms, and also voice their concerns over potential effects arising from low frequency noise.</p>	energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P228		Martin O'Donnell on behalf of Seamus McKinney	<p>1. Submission requests that lands within Tullyarvan, Buncrana zoned as Agricultural/Rural in the Draft CDP be rezoned Primarily Residential for the following reasons:</p> <ul style="list-style-type: none"> ▪ Existing residential developments extend beyond the subject site. ▪ Infrastructural services extend past this site. ▪ Development of this site would allow for road widening, upgrade of services and provision of a footpath making this stretch of road safer for road users and pedestrians using local community services. 	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P229		Michael and Pdraig MacGinty	<p>1. Submission requests that lands at Cornagil, outside the proposed settlement boundary of Letterkenny and within an area of 'strong urban influence' in the Draft CDP, be considered for inclusion within the Settlement boundary for the following reasons:</p> <ul style="list-style-type: none"> ▪ It is suggested that this would allow for a choice of housing in attractive settings with road access that can be readily developed. ▪ The site is near the university hospital and is an ideal location for consultants that may choose to locate in a different town in a nice area without fear of exclusion. 	1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P230	RES UK & Ireland Ltd.	Edel Burke	<p>1. Submission sets out the background of RES UK and Ireland Limited as below:</p> <ul style="list-style-type: none"> ▪ One of the worlds leading independent renewable companies that construct and operate renewable energies having globally built approx. 10GW of renewable energy generation ▪ They have developed and/or constructed 16 on shore windfarms on the island of Ireland since the early 1990s. <p>2. RES feel the CDP does not recognise the renewable sector enough in tackling climate change, assisting with the decarbonisation agenda and the wider benefits thereof. To</p>	1. to 10. Refer to themed response on renewable energy contained in section 3.7 of this report.

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			<p>progress Irelands transition to a low carbon economy, promoting energy sustainability and improve security of supply, the CDP should include more progressive policies to further reduce the reliance on fossil fuel. The introduction of spatial zones where wind farms are precluded will excel most/all viable sites restricting potential for cheaper electricity and a knock on effect for the most economically vulnerable.</p> <ol style="list-style-type: none"> 3. RES state they fully recognise the need to protect the natural environment and an in depth understanding of the site selection constraints in the county and will endeavour to consider all environmental, visual, socioeconomic, technical and engineering constraints to ensure optimum sites are selected. 4. RES state as UNACCEPTABLE the proposed 10x tip height constraint and mapping of areas as not acceptable in a county boasting some of the finest wind resources in Europe. 5. RES state as UNACCEPTABLE the proposed wind mapping and each proposed project should remain open for consideration: The wind mapping is attempting to pre-empt the work of hundreds of hours of surveys and strategic design and mitigation measures designed to reach a conclusion on whether or not a piece of land is acceptable for the siting of a wind farm development. 6. RES cite the 'Open to consideration zoning within 1km of Lough Derg indicates the screening process used to complete this process is flawed. 7. RES would encourage DCC to consider a positive planning policy to support the redevelopment and expansion of existing wind farm sites, citing a policy in use in Scotland. 8. RES state they are a world leader in the development of energy storage requiring increased flexibility is needed in the operation of the electricity network to deliver secure low carbon energy. This developing sector should be provided for in the CDP. 9. RES suggest provision be made for retrofitting energy storage units adjoining sites and at new locations. 10. RES state that the most suitable sites will be close to existing substations/ adjoining the energy resource such as wind farms or solar farms or adjoining the energy user, e.g. beside industry/ urban centres. 	
P231	Joe Bonner Town Planning Consultant on behalf of Bernard Greene	Joe Bonner	<ol style="list-style-type: none"> 1. Submission relates to lands outside the settlement boundary of Loughanure village (layer 3- Map 15.47) 2. Submission seeks an extension to the settlement boundary to allow completion of a partially completed residential development of 3 houses within the 50kph speed limit. 3. Submission states that permission had been granted several times (04/2489, 08/30293, 09/30425) and a range of site works completed in advance of the adoption of the CDP 2012-2018, prior to the settlement boundary being reduced by 30m at this location; 09/30425 was permitted for an extension of duration until 21st August 2012. A subsequent application 13/50380 for 3 dwellings was refused on the basis of contravening UB-O-1 and UB-P-1 of the Core Strategy/Settlement hierarchy of the plan. 4. Submission acknowledges the change from the existing CDP 2012-2018 that allocated a 	1. to 9. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>population % to tier 4 'small village' settlements and that of the Draft CDP 2018-2024 that has a global figure for small towns and the rural area.</p> <p>5. Submission states that the settlement boundary in the Draft Plan is not considered acceptable or appropriate for the reasons below:</p> <ul style="list-style-type: none"> ▪ Development Plan Guidelines (DOECLG) set out an approach to ensure enough land will be available to meet anticipated development requirements and will be developed in a sequential and co-ordinated manner. ▪ CDP 2012-2018 had allocated 5 houses to Loughyanure; the sites identified would allow 7-8 but not all sites may become available during the life of the plan. ▪ A review carried out by the landowner identified 3 potential sites within the village that would be suitable for residential development and a 4th has a live permission, and states that these sites may also be used for commercial, educational or community uses and that these sites may not be suitable for development due to constraints. ▪ The subject site is located immediately adjoining the revised village boundary. ▪ Principle of development has been established on the site. ▪ The access road and one site has been cleared to the same level as adjoining property. ▪ Details of costs that have been incurred as a result of development of the site to date. <p>6. Submission sets out a detailed analysis of the capacity, in their opinion, of the other vacant sites identified by them for potential development within the settlement boundary, to accommodate development.</p> <p>7. Submission cites the following policies in the Draft Plan they consider relevant to the development of the subject site: UB-P-6, CS-P-3, CS-P-4, UB-P-8, CS-O-6, CS-O-7, CS-O-12, CS-O-14.</p> <p>8. Site Assessment carried out in 2012, deemed the subject site suitable for the installation of a septic tank and treatment system in accordance with the EPA's 'Code of practice: Wastewater Treatment and Disposal Systems Serving Single Houses'.</p> <p>9. Submission sets out they have submitted a report that confirms a lack of available sites within the village to fulfil the requirements of the councils housing strategy with respect to choice of location. This coupled with the fact of 2 previous grants of permission, significant works have been carried out, infrastructure is installed and that development charges have been paid, that this site is in effect a brownfield site with an unfinished housing development and as such the landholding indicated should be included in the settlement boundary of the village.</p>	
P232		Anna Slevin	<p>1. The submission relates to lands within the settlement boundary of Ballybofey-Stranorlar (layer2A-Map15.2). The submission suggests that lands within a specific site be zoned as a mix of Retail, Small Manufacturing and Storage.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

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P233	OConnor Burke Architecture Ltd	Kenny Burke	<ol style="list-style-type: none"> 1. The submission relates to lands within the settlement boundary of Muff (Layer 3- Map 15.51). 2. The submission is made on behalf of Muff Service Station Ltd and requests that this site in their ownership retain its current zoning as an opportunity site; the reason being that this site has a strong linear frontage along the streetscape that could potentially enhance the streetscape within the village and that Muff Service Station Ltd and O'Connor Burke Architectural Ltd are at an advanced stage of preparing a planning application to develop a bar and restaurant on this site. 	<p>1. & 2. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P234		Aine O'Loughlen	<ol style="list-style-type: none"> 1. Submission welcomes the inclusion OF Especially High Scenic Amenity sites and supports the inclusion of coastal areas, Loughros point and in particular the islands. However, no consideration has been given to the views back from the islands, (NH-P-6 & NH-P-7). 2. Submission supports policy BH-P-11, regarding the built heritage of the islands as these landscapes present a piece of the nation's heritage and should be protected. The character of these places is being eroded and retention of buildings and streetscapes need promotion through the CDP. Should consider extension of ACAs to the islands that have unique architectural character e.g. Inishboffin, Owey, Gola, Inishoirrer and Inishmean. Submits that council fulfil their obligations under the DCHG Architectural protection Guidelines for Planning Authorities in full, part IV of the Planning and Development Acts. 3. Submission references the lack of active planning enforcement; mobiles homes in inappropriate locations, houses built without appropriate planning permission, and associated staffing resources, pointing to a reactive rather than proactive system. 	<p>1. & 2. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.</p> <p>3. Comments noted – however, the matters raised are outside the remit of the Draft CDP.</p>
P235	Údaras na Gaeltachta	Séamas Ó Gallachóir	<ol style="list-style-type: none"> 1. Submission suggests a number of amendments to chapter 11, Community, Culture and the Gaeltacht as itemised hereunder. 2. That text on page 153, third paragraph under the heading of culture be amended so as to include the words 'enriched and' in the last sentence and thus to read as follows (new text shown in blue): 'The Council believes that to invest in arts, culture, heritage and language is a commitment to a healthier, more fulfilled, prosperous, enriched and successful county'. 3. That text on page 154 under the header of 'Recent Decline in Irish Language' be amended so as to insert text into the second sentence of the paragraph which is suggested to read as follows (new text shown in blue): ' In particular the key study 'Comprehensive Linguistic Study of the Use of Irish in the Gaeltacht: Principal Findings and Recommendations 2007' and more recently by the 'Update Report to the Comprehensive Linguistic Study on the Usage of Irish in the Gaeltacht; 2006-2022', published in 2015 indicated that this decline is being driven by such factors as: social dynamics (the linking of Gaeltacht Communities to wider English speaking networks), demographic movements (the movement of non-Irish 	<p>1. to 7. Refer to themed response on community, culture and the Gaeltacht contained in section 3.10 of this report.</p>

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			<p>speakers into the Gaeltacht), and socialisation of young people through English.'</p> <ol style="list-style-type: none"> 4. That the typo spelling of 'Údarás na Gaeltachta' be corrected at top of page 155. 5. That additional text be inserted on page 155, after the bullet point list of Community language Plans to state (new text in blue): 'To date two of the plans have been prepared namely 'Gaoth Dobhair, Rann Feirst, Anagaire agus Loch an Iúir' and 'Cloich Chionnaola, Gort an Choirce, An Fál Carrach agus Machaire Rabhartaigh.' The remaining six language plans will be prepared by the end of 2018. 6. That objective CCG-O-8 , on page 156 be amended so as to insert an additional bullet point as the second in the sequence and to state (new text in blue): 'That the Council be pro-active in providing quality Irish medium service in all their Public Service Offices.' 7. That the typo spelling in the 5th bullet point of Objective CCG-O8, on page 156 be corrected to state, 'Páirc Ghnó Ghaoth Dobhair Business Park.' 	
P236		Martin O'Donnell	<ol style="list-style-type: none"> 1. Submission relates to an area of 11.72 acres located outside the settlement envelope of Moville in an Area Under Strong Urban Influence (site Map attached to submission) 2. Submission requests the rezoning of their lands to facilitate the development of a nursing home/ retirement village/ social and affordable housing for the reasons below: <ul style="list-style-type: none"> ▪ A 7.3m access road from the Malin Road into the site has been agreed and is partially complete. ▪ Development of this type would benefit the local community 	<ol style="list-style-type: none"> 1. & 2. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P237		Niall O Brien	<ol style="list-style-type: none"> 1. Submission supports the draft zoning of an area within Cashelnavern LCA40 as unfavourable for wind energy development. Requests that the area remain as it is valued by people who live there and is not open to wind farm developments 2. Submission states that 10x tip height from homes is needed. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report. 2. Refer to themed response on renewable energy contained in section 3.7 of this report.
P238	Jennings O'Donovan & Partners Ltd	David Kiely	<ol style="list-style-type: none"> 1. Submission welcomes E-O-5 and E-P-10 which are supportive of wind energy. 2. Objects to E-O-6 and its link to the setback distances provided through the development Guidelines and Technical Standards and requests its deletion for the following reasons: <ul style="list-style-type: none"> ▪ It is inconsistent with E-O-5 and E-P-10, is not in compliance with the Wind Energy Development Guidelines 2006 and there is no scientific evidence base to back up the proposal. ▪ It will be overly restrictive on many potentially suitable wind farm sites and does not allow for proper assessment of potential impacts. ▪ A setback of ten times tip height is not necessary to meet recognised noise limits and 	<ol style="list-style-type: none"> 1. to 3. Refer to themed response on renewable energy contained in section 3.7 of this report.

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			<p>noise limits can be achieved under current noise assessment guidelines.</p> <ul style="list-style-type: none"> ▪ The relationship between distance from a turbine and noise effects is significantly variable. Suggest the proposed revisions in the targeted review, 2013, specifies a limit of 40dBA represents determined best practice. ▪ Proposed wording removes the right of an individual to consent to the location of a turbine at a close distance from their dwelling. ▪ States that the approach will render it virtually impossible for any location to be found for an economically viable windfarm due to the extent of one-off housing spread in the county. ▪ States that the approach will eliminate potential for the installation of single turbines such as house proposed by farmers/large scale landowners/cooperatives. ▪ States the approach may restrict community wind farm projects for which the community is the principal benefactor. ▪ The Environmental Report does not address the setback distance. <p>3. Requests that map 8.2.1 is not implemented and that the existing map in the current CDP is maintained for the following reasons:</p> <ul style="list-style-type: none"> ▪ That the reduction in areas 'open to consideration' together with the proposed setback distance will render future greenfield development of economically sustainable wind farms as unachievable. ▪ That not all windfarms that have been granted permission have been marked as 'areas for augmentation.' (Gives an example of Derrykillev Wind Farm; 14/51400). ▪ The approach will jeopardise Ireland's ability to meet renewable energy targets. 	
P239		Cressida Canavan	<ol style="list-style-type: none"> 1. Submission requests that restrictions on wind farm development be amended to positively encourage wind farm development in the county and Inishowen, as there is a need for home generated renewable energy to combat climate change and provide economic benefit to deprived rural areas. 2. Requests that council delete constraints set out in section 8.2 of the Draft Plan and limit turbine set back distances to 4x tip height. Also request that previous wind energy zoning map from 2014 be re-instated and that the draft plan has almost no land provided for new wind energy projects. 	1. & 2. Refer to themed response on renewable energy contained in section 3.7 of this report.
P240		Christopher Wallace	<ol style="list-style-type: none"> 1. Submission requests that restrictions on wind farm development be amended to positively encourage wind farm development in the county and Inishowen, as there is a need for home generated renewable energy to combat climate change and provide economic benefit to deprived rural areas. 2. Requests that council delete constraints set out in section 8.2 of the Draft Plan and limit turbine set back distances to 4x tip height. Also request that previous wind energy zoning map from 2014 be re-instated and that the draft plan has almost no land provided for new wind energy projects. 	1. & 2. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P241		Breda and Joseph Boyle	1. Submission sets out the benefit that the WAW has had on their tourist accommodation in Kincasslagh, and the number of first time international visitors they have had that have commented on the natural unspoilt beauty of the county, vistas that make for an authentic experience and also the captivating landscape. Submission requests that DCC is cognisant of these perceptions when drafting the CDP.	1. Refer to themed response on tourism contained in section 3.8 of this report.
P242	John McCay Architect on behalf of Patsy (PJ) Doherty	John McCay	1. Requests that the settlement envelop of Milford (Map 15.49) be extended so as to include lands delineated on the map attached to the submission for the following reasons: <ul style="list-style-type: none"> ▪ There is an existing and live planning permission on the lands for 12 no. retail units and first floor offices (07/51090). ▪ The land is adjacent to a Lidl supermarket and car park and the growth of the town has continued along this stretch of the Letterkenny road including 3 no. housing estates in the vicinity of the lands in question. ▪ There is an already established urban pattern in the area. ▪ The proposed extension of the settlement envelop would give a truer reflection of the towns extents. 	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P243	Kilcar Parish Council	Linda Lyons	1. Submission voices concern over no effort being made with links within the state to help contribute and maintain services. The location of Kilcar in the SW of the county is somewhat excluded/limited in the choice of transport and subsequently in attracting businesses to and the development of the area. There should be more emphasis placed on upgrading regional roads to encourage more industry to smaller towns and villages can maintain established businesses, upholding and increasing population and attracting more cottage based industries and tourists. 2. Submission voices concerns over the categorisation of Kilcar and lists the many various facilities that contribute to a good quality of life to locals, maintainable through the support of Údarás na Gaeltachta. There are over 300 people in fulltime employment, there is a purpose built industrial estate with room for expansion, over 50% of the customer base is in Europe and Worldwide. Submission suggests a lack of infrastructure and high speed broadband will be a threat to employment, cause difficulty in attracting further industry leading to a population decline. 3. Fintra Bridge on the R263 is not suitable for large/ long vehicles due to its narrow width and bend; this is the only road servicing this area and should there be a road closure there is an approximate detour of 50km that could be critical in terms of an emergency. 4. Submission cites concern that the settlement area boundary of Kilcar (layer 3-Map 15.30), is reduced and does not include things such as the local church, GAA grounds and council housing estate among others. Requests clarification on the relationship/difference between town boundaries, settlements areas and speed limits. 5. Submission highlights the issue of the need to upgrade existing roads; recent water,	1. & 2. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 3. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 4. Comments noted. 5. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 6. Refer to themed response on community, culture and the Gaeltacht contained in section 3.10 of this report. 7. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 8. Refer to themed response on Infrastructure contained in section 3.3 of this report.

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			<p>broadband and drainage works over the years have contributed to their deterioration. The promotion of the WAW has led to increased traffic on the roads, many more rural than marked on the map; lack of lay-bys contributed to traffic congestion that were not noticed before the WAW and provision of same on industrial routes would benefit the area. Kilcar is investigating how to promote tourism in this unspoilt area and it is difficult to do this without the backing of the council.</p> <p>6. Names of villages outside the Gaeltacht should be given the same prominence as those within the Gaeltacht.</p> <p>7. Submission states that people native to the area have been refused homes on their own land, leading to young people moving away and a decline in population. An agreeable outcome should be attained to allow natives to remain on local land.</p> <p>8. High Speed Broadband needs rolled out to rural areas for the development of the area for business, tourism and recreation and allow people to work from home.</p> <p>9. Submission states that Kilcar should be accorded Heritage Town status for the following reasons:</p> <ul style="list-style-type: none"> ▪ Long established tweed and knitwear industry ▪ Proximity to sites of archaeological and historical importance ▪ Megalithic tombs and sites dating from the stone and bronze age ▪ 19th century corn mill under restoration that will be open to the public as a working mill. ▪ Thatched cottage ▪ All of these sites are popular with tourists and also of tourist value are: the scenic coastline, game fishing, beaches local piers, views of Sliabh Liag and from the coast road to Carrick. <p>10. Kilcar Parish council are conducting a coastal survey that will promote the area further.</p>	<p>9. & 10. Comments noted – however, the matters raised are outside the remit of the Draft CDP.</p>
P244	John McCay Architect on behalf of Patsy (PJ) Doherty	John McCay	<p>The submission requests the extension of the Settlement boundary of Milford from that indicated in the Draft Plan (Layer 3 Map 15.4 to include lands at Forquar as delineated on an attached map for the reasons stated below:</p> <ul style="list-style-type: none"> ▪ Planning permission was previously granted on these lands (ref 08/50219) for 34 units, as part of an extension to the already constructed Lough Fern Heights Development. ▪ On foot of this permission a large amount of site preparatory work was carried out on the site including kerbing, main drainage runs, road bases etc but ceased during the economic recession. ▪ There is an established urban area and significant expenditure on ground works already carried out. ▪ Inclusion of this site with partially completed infrastructure works within the Settlement Envelope' would give a truer reflection of the towns events and allow the possibility of applying for planning permission to complete the housing development. 	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>

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P245	Donegal Caravan & Camping parks Association	Christina McEleney	<ol style="list-style-type: none"> 1. The submission relates to Caravan and Camping Parks within the county in the context of tourism and provides comments on tourism objectives and policies and provision of bye-laws. 2. TOU-O-1, submits that DCC should not provide overnight parking for motorhomes as they are free or underpriced and this directly undermines and unfairly competes with local providers. The provision is in direct contravention with individual providers that will inhibit potential private investors from becoming involved in this sector and discourage the existing business owners from continuing to invest. 3. TOU-O-2, DCC should develop bye-laws that prohibit discriminate overnight parking and camping that are injurious to views and access to other business, in order to protect and enhance Donegal's landscape and natural environment. DCC should protect and strategically manage this type of 'niche' visitor in light of recent increases in this type of holidaying, and that grey water waste, rubbish and chemical toilet disposal are at a minimal level of provision, mostly by private provision and if there is a decline in this provision the matter will get worse.. 4. TOU-O-5, Motorhome accommodation should not be provided by DCC as the council is tasked with supporting the development of private sector provision and DCC does not have the capacity to cater and manage overnight parking. Claim that unfair competition by DCC will erode private investment as charge between €5-€12 whereas the private sector charges €20-€30, had previously requested an explanation in the disparity from Council official and Local Representative but no explanation provided. Expresses concern over paying rates as a private provider to DCC when they are in direct competition. <p>TOU-O-14, repeats previous points in relation to overnight parking undermining the niche market making providers hesitant to re-invest and upgrade services as this could be futile and a waste of money going forward, and that should DCC continue to provide public camping facilities private providers will have no economic choice and withdraw from the market and are impinging on the prospect of other providers entering the market</p> <p>TOU-P-4 and TOU-P-11, state that the private sector would not be permitted to provide motor home overnight parking in the same manner as DCC due to Planning Regulations, in that DCC does not need planning permission to establish a motor home</p>	<ol style="list-style-type: none"> 1. to 5. Refer to themed response on tourism contained in section 3.8 of this report. 6. to 8. Comments noted – however, the matters raised are outside the remit of the Draft CDP.

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			<p>parking facility, creating an unfair advantage citing an example where DCC are in contravention of its own policy at Carndonagh. It is anticipated there will be a growth of motorhome tourism associated with the WAW and this requires careful consideration to provide a quality experience for the visitor and bring benefit to those involved in the business. The submission considers it prudent that DCC only provide sites that are not within a 30mile radius of private caravan sites.</p> <p>TOU-P-17 and TOU-P-20, contends that the proposed Policy in relation to development within a safe walking distance is unquantifiable, open to interpretation and ambiguous, and could prohibit future private development, as most caravan parks are outside towns/villages. Also states that due to the rural nature of the county the installation of a footpath could be an issue. Interpretation of this policy could lead to prohibition of this policy item in proximity of the WAW</p> <ol style="list-style-type: none"> 5. Submission refers to 'Wild Camping' at piers and that at no time is it safe or appropriate to have a collection of motor homes parked overnight suggests that bye-laws should be introduced that specifically deal with this issues and with motor homes parked at the edge of beaches. 6. Raises concern at cattle roaming on beaches and suggests this should be addressed by bye-laws. 7. Claims that the demise of private sector provision will generate problems for DCC creating a deficit in the management of this sector. 8. Submission sets out the context and nature of their organisation related to motorhome and camping provision in the county. 	
P246	John McCay Architect on behalf of Patsy (PJ) Doherty	John McCay	The submission confirms support for the proposed inclusion of his lands within the settlement boundary for Carndonagh, Layer 2a Map 15.4 Carndonagh, as contained within the Draft Plan, and thereby allow the possibility of applying for planning permission to complete the housing development.	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P247		Grace Canavan	The submission requests that the restrictive policy be amended in order to positively encourage wind energy, stating that home generated renewable energy is needed to combat climate change, save on imported fossil fuels and provide an economic benefit to deprived rural areas. Requests the deletion of constraints set out in Section 8.2 limiting turbine set back distance of 4 x tip height. The submission requests that the previous zoning map from 2014 be re-instated as	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			the Draft Plan has almost no land provided for new wind energy projects.	
P248	Carr & Company	Michael Carr	<p>The submission relates to lands designated as 'Structurally Weak Rural Areas' within the townlands of Kinnalargy and Rosapenna, Downings, location maps attached to submission, and requests DCC allows some scope in these areas for HH development where appropriate.</p> <p>Makes specific reference to paragraph RH-P-4 that states "<i>New holiday home development will not be permitted in these areas</i>", stating that this condition is too restrictive and not in the interests of the wider area for the following reasons:</p> <ul style="list-style-type: none"> ▪ Their lands provide suitable sites for holiday and permanent homes that could be sensitively designed so its not detrimental to the rural area. ▪ Demand for HH and permanenet homes continues to be quite strong. ▪ Fanny's Bay and White Bay provide access and mooring for year round pleasure boats to Mulroy Bay and future potential for a marina. ▪ Boat yard has tourism potential. ▪ Existing homes and HH have integrated well into the local landscape. ▪ Area is 2km from Downings and has satisfactory road network serving the boast yard and existing houses. 	Refer to themed response on rural housing contained in section 3.5 of this report.
P249	Canavan Associates Ltd	Seamus Canavan	<ol style="list-style-type: none"> 1. The submission relates to Wind Energy. It claims the draft CDP wind energy zoning polices are restrictive in relation to Map 8.2.1 Draft wind Energy Map with unsubstantiated and discriminatory FWPM exclusion, unreasonable 10x tip height and are an unwarranted departure from the '2017 Variation'. 2. States that objective 1 and policy 1 of Section 8.2 of the 6 objectives and 21 policies are at variance with the remaining 5 objectives and 20 policies where general statements are in support of wind and other energy development. 3. Seeks specific amendments as follows to reflect national policy: <ol style="list-style-type: none"> (i) Objective E-O-6 deleted. (ii) Modification of E-P-12 including deletion of curtailment of extensions to wind projects and re-applications and production of a modified wind energy map. (iii) Have more areas considered as being 'Open to Consideration' in an amended wind energy map reflecting largely the pre Variation No.2 CDP Map. (iv) Amend section 6.5(c) to delete reference to map 8.2.1 unless the map is superseded with the pre variation CDP wind energy map. (v) Amendment to the Development Guidelines and Technical Standards at section 6.5, 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>page 173 so as to:</p> <ul style="list-style-type: none"> ▪ Delete section 6.5 (e) regarding FWPM restrictions and replace with the need for appropriate studies to be conducted to scientifically assess risk and provide mitigation measures. ▪ Amendment of section 6.5(f) regarding set back distance to replace the requirement of 10 x tip height set back with a requirement for 4 x tip height or 500m set back from dwellings. Also seeks deletion of reference to 'other centres of human habitation.' <p>(vi) Insertion of caveat that where household occupiers consent to turbines that the set back distance does not apply.</p> <p>4. Claims the Draft Plan policies and map are in direct contravention of National policy relating to: alternative indigenous energy sources and minimisation of greenhouse gas emissions, RPGs 2010-2022, Ministerial circular PL 5/2017 and Ministerial Information note on the revised wind farm planning guidelines of July 2017.</p> <p>5. States that there is not adequate scientific evidence for Map 8.2.1.</p> <p>6. States there are significant reclassifications in the wind energy Map that are presented without basis or evidence and methodological approach to classifying these areas which remains unchanged from the previous Plan, and as such the Map is not fit for purpose.</p> <p>7. The intention of the minister to maximise wind energy potential in the Wind Energy Guidelines 2006 will be thwarted by the Draft Plan.</p> <p>8. The Draft Plan has erred by overlooking/ignoring potential investment opportunities from wind and abilities to meet renewable energy targets impacting on local economic growth and diversity of rural economics</p> <p>9. Suggests the Draft Map is in contravention of the principle set out in Circular PL5/2017.</p> <p>10. Suggests that in its current format, the Minister would call in the Draft CDP and modify it. Notes Circular PL5/2017 in relation to the reminder to local authorities of their statutory obligations in addressing renewable energy.</p>	

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P250	ICBAN	Joanne Breen	<ol style="list-style-type: none"> 1. The submission relates to Economic Development, Telecommunications and Transportation. 2. The submission sets out the vision and objectives of ICBAN's Regional Strategic Framework (RSF) for 2013-2017. 3. Submission welcomes Objective ED-O-01 in relation to cross border collaboration and commends the development of the North West City Region initiative referring to the impact of Brexit and the continuance of cross border collaboration. 4. Submission refers to ED-O-7 and recognises the importance of tourism to the County and wider border area highlighting the importance of the Central Border Region as 'sustainable' and provides a framework to take forward opportunities such as cross border development between local authorities, cross border tourism strategy. 5. Submission welcomes policy TC-P-1 to facilitate deployment on the National Broadband Plan and encourage DCC to refer to the ICBAN National Broadband report, key findings are detailed. 6. Submission recognises the importance of transportation and that there has been evidence that the area has not received its fair share of infrastructure investment. The submission states in the border area only 45% is spent in comparison to other regions. Highlights the importance of the N2/A5 and N16/A4 road connecting corridors and that investing in key transport corridors will help promote the strategic development of this area. 	<p>1. to 4. Refer to themed response on economic development contained in section 3.2 of this report.</p> <p>5. & 6. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p>
P251	IWEA Irish Wind Energy Association	Adam Ledwith	<ol style="list-style-type: none"> 1. The submission is made by Irish Wind Energy Association (IWEA) regarding Wind Energy objectives and policies in the Draft Plan. 2. The submission provides a background on the positive harvesting of wind energy in Donegal with 13% of Ireland total capacity, enough for 250,000 homes and the benefits of €2.5million to DCC from development contributions. The submission states that the current Draft Plan has proposed measures that will limit wind development and suffer financial loss in future during a 'repowering' phase. 3. The submission states that Draft DCC plan policy on 10 x tip height is at variance with Wind Energy Development Guidelines (WEDG) 2006 and 'Draft preferred approach' on 13th June, 2017 and questions the evidence used. The submission also questions the non-executive report used and assumes the Planning Authority does not support this increase set back constraint. 4. The submission refers a circular issued to all Local Authorities on the 3rd August, 2017 and that Councils are obliged to a) acknowledge national policy on renewable energy, 	<p>1. to 12. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>b) how the plan will contribute to national targets and c) that a material consideration would arise in an SEA if mandatory set back distance would change and create a constraint on renewable energy.</p> <p>5. The submission provides a narrative and data on energy targets and related documents that provides a context for Renewable Energy demands that includes Progress towards National Renewable Energy 2020 Targets, Security of Energy Supply and competitive of Wind Energy and Local Benefits The submission states that IWEA principally in support of E-O-5 and E-P-10 but have concerns in relation to text of E-O-6 s6.5 (f) that refers to 10 x Tip height.</p> <p>6. The submission refers to text on p128 and p48 of the Draft CDP that relates to noise and set back distances and have countered a table that shows the limited number of recorded incidences.</p> <p>7. The submission questions the scientific evidence that justifies the set back separation distance and has specifically requested that any reference to 10 x tip height be deleted as this is not in compliance with national policy.</p> <p>8. The submission also refers to Freshwater Pearl Mussel and refers to National Parks and Wildlife Service (NPWS) and that a blanket ban on individual strength species designation is not recommended</p> <p>9. The submission also questions the areas 'Open for Consideration' and that this will leave only 1.5% remaining in the County for Wind development. The submission also supports and refers to E-P-12(b) that permits extensions to wind farms of up-to 20% but considers this to be too restrictive. The submission also questions the scientific evidence of E-P-12 and associated Map 8.2.1 and also questions the difference between the existing plan for 'Open for Consideration' AND Draft Plan 'Open for Consideration' and how a vast difference in the area of the county can be used as evidence to declassify these areas when the criteria used to define was almost identical.</p> <p>10. Requests that section 6.5(f) of CDP 2018 and any other reference to 10x tip height be deleted as this is not in compliance with national policy.</p> <p>11. Request that the Draft 8.2.1 be removed and that a new process be commenced with clear scientific evidence provided given the revised zonings and that the areas zoned 'Not Acceptable' following Variation 2 be reinstated claiming that the draft plan is in direct conflict with section 3.4 of the WEDG (2006) and IWEA.</p> <p>12. Requests that Map 8.2.1 appended to the Draft Plan be removed and either a new process be commenced using clear scientific evidence is given or original map of the CDP 2012-2018 (before Variation No.2) be reinstated as this was "evidently" drafted based on proper planning considerations.</p>	

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P252		Kenneth Carson	<ol style="list-style-type: none"> 1. The submission relates to policies pertaining to access onto National Roads. 2. Submission requests that the policy in operation in 2000 regarding NP access (the text for this policy has been attached) be reinstated to allow consideration for farmers and their families to get planning permission on their own farm where no other road frontage exists. 	<ol style="list-style-type: none"> 1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.
P253		Monica and Seamus Doherty	<ol style="list-style-type: none"> 1. The submission relates to Wind Energy development particularly in the Finn Valley and Cashelnavern LCA areas. 2. Requests that Finn Valley and Cashelnavern LCA areas be zoned unacceptable for wind farm development, citing the following reasons: <ul style="list-style-type: none"> ▪ DCC recognise these areas as great ecological importance ▪ Finn Valley LCA area has 1019ha of Natura 2000 sites and 80.33 ha of pNHA sites ▪ Cashelnavern LCA area has 311.6ha of Natura 2000, 451.7ha of NHA sites and 126.2ha of pNHA sites. ▪ Croaghonagh Bog SAC is near to the oligotrophic lakes of Lough Mourne and Lough Carn. ▪ Should wind development go ahead it would be a major loss to this ecologically important habitat in the county. ▪ Would be overbearing in this landscape due to the settlement pattern in this area, in some cases could surround homes by an unacceptable degree. This landscape cannot mask the sheer scale and visual dominance of wind turbines from peoples homes and surrounding areas. Claim that shadow flicker is a major visual intrusion and can have a nauseating effect. ▪ Noise levels of 43DbA proposed by new national guidelines would be unacceptable in this low noise area, affecting the local residents. Low frequency noise is also a major issue to be addressed. ▪ Homes susceptible to changes in noise and visual amenity will suffer devaluation. 	<ol style="list-style-type: none"> 1. to 2. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P254		Shaun Ferry	<ol style="list-style-type: none"> 1. Mr. Ferry is staunchly opposed to plans for a large scale windfarm in the Finn Valley and Cashelnavern areas. The '10 times tip height' set back distance should remain and the Cashelnavern and Finn valley LCA area should remain untouched by wind energy development. Wind energy development in these areas would result in a major loss of important habitat and would be visually unacceptable, would result in noise nuisance and would devalue homes. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P255	Coillte	Valerie Brennan	<ol style="list-style-type: none"> 1. In the event that the current contents of Section 6.5(f.) and draft map 8.2.1 are adopted, further opportunities for sustainably designed renewable energy projects in Donegal will never be developed. The wind energy policy as drafted is wholly inconsistent with national 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report.

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			<p>guidance on this matter, contradicts other objectives and policies in the CDP and would constitute an effective ban on wind energy in Co. Donegal. Coillte request that Section 6.5(f.) be deleted and that the Council review its wind energy strategy in respect of wind area classifications. Coillte fully supports the IWEA submission on the Draft CDP.</p>	
P256	<p>McCarthy Keville O'Sullivan Ltd Planning & Environmental Consultants</p>	Jimmy Green	<ol style="list-style-type: none"> 1. A conflict exists between the stated support for wind farm and renewable energy development and the significant policy and development control constraints being applied through other policies in the Draft Plan. If the Plan is adopted in its current form, it would significantly reduce the ability to deliver wind farm developments on appropriate sites within the county. 2. The Draft CDP does not comply with Dept. Circular PL20-13 nor PL5/2017 and the associated 'interim guidelines' for wind energy development - the Plan will therefore have to be amended. 3. The SEA fails to take account of the massive restrictions being placed on the development of on-shore wind and will have to be altered to take account of and justify the position put forward in the Draft CDP. 4. The Draft Plan designates the 'Planree' site (northeast of Barnesmore Gap) to now be 'Not Acceptable' for wind farm development; no grounds have been put forward for this decision, which is also not considered in the SEA. 5. The 'open to consideration' areas in the current CDP must be retained to comply with Dept. circular PL20-13 and PL5/2017. 6. Changes to wind energy mapping and policy should not be brought forward as a result of arbitrary, non-scientific or political motivations. 7. The Draft CDP and SEA must demonstrate how and where the national renewable energy and climate change targets can be delivered at local level in Co. Donegal. 8. The SEA must critically assess the stated policies and objectives of the Draft CDP. The SEA currently fails to assess whether the policies of the Draft are sufficient to meet Donegal's obligations to help achieve national climate change targets. 9. The site of Planree Ltd.'s previous SID wind farm application (ABP Ref. PA0040) should be retained as 'open to consideration'. Wind turbine setback distances as set out in national guidance should be applied. The EHSA are in the vicinity of the site should be altered from that in the Draft Plan to be consistent with the current CDP. In the event that the PA do not apply the 'open to consideration' classification to the entirety of the subject lands, the western portion of the lands (centred on Carrickaduff Hill) should be so designated. 10. It is suggested that the PA amend the current CDP to allow for individual sites to be considered for wind farm development in the event of detailed site-specific assessments demonstrating that a site is suitable for the provision of wind turbines event if it is within a 'Not Acceptable' area. 11. The 'ten times tip height separation distance' has been adopted at the behest of Councillors without the support of the Executive and without any clear scientific basis or context. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>12. There is no clear rationale for the proposed fundamental changes to the Landscape Amenity designations in the Draft CDP. The extension of EHSA areas and the introduction of 'High Scenic' and 'Moderately Scenic' amenity areas, has significant implications for future wind energy development in the County.</p> <p>13. The LCA does not contain any landscape sensitivity ratings to accompany the various landscape character areas or types. It is also noted that the adopted LCA offers no recommendations for the significant extensions of EHSA areas as proposed in the Draft CDP.</p> <p>14. Under Section 7.1.1, a specific exclusion is added for wind energy development. No rationale is provided as to why wind energy proposals or ancillary works have been excluded over all other classes of development. It is suggested that there is a targeted approach by DCC to undermine future wind energy development.</p> <p>15. In the Draft Plan there are some areas of EHSA and HSA included within 'Open to Consideration' areas for windfarms (a departure from the current CDP, where EHSA areas are 'Not Acceptable' for windfarms). This is an unusual anomaly and it is not clear whether this was intentional.</p> <p>16. There are gross contradictions in the Draft CDP, where on the one hand areas are deemed to be 'Open to Consideration' but on the other policy stipulations regarding setback distances effectively put paid to windfarm development potential. In reality, only 7.3% of the 'Open to Consideration' area has any prospect of being considered for a wind energy development when the 10 time setback distance is factored into play. There is simply not enough land classified as Open to Consideration to make any meaningful contribution to future national targets on climate change.</p> <p>17. Under the provisions of the Draft CDP, there are significant alterations proposed which would impede the ability of the Carrickaduff site to cater for a wind farm development. ABP has previously considered the site to be appropriate for wind energy development and refused the previous SID application only on the basis of a reason relating to potential impacts on bird species.</p> <p>18. The LCA (adopted in May 2016) did not make recommendations in respect of landscape designations, yet the Draft CDP incorporates significant changes to such designations. The extension of the EHSA area in the vicinity of the Carrickaduff site is subjective in nature. The boundary of the EHSA area should be redefined.</p> <p>19. The Draft CDP is severely deficient in terms of providing policy measures to achieve real and tangible effects on tackling climate change.</p> <p>20. The significant constraints being applied to the existing wind energy strategy are neither acknowledged, discussed nor argued against within the SEA of the Draft CDP. The air and climate indicators and targets proposed to be utilised to monitor the significant environmental effects of the implementation of the Draft CDP are too narrow in their scope and are unfit for purpose (it is suggested that the repetition of environmental objectives, indicators and targets from the Environmental Report of the CDP 2012-2018 does not provide for a sufficiently measurable account of the likely environmental effects of</p>	

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			<p>implementing the Draft CDP. This is particularly pertinent given the significant changes in relation to wind energy. It is submitted that the Environmental Report on the Draft CDP does not meet the requirements of the SEA Directive.</p> <p>21. A detailed landscape review (inclusive of mapping) has been prepared by Stephenson Halliday Ireland, suggesting mapping amendments to EHSA areas, area of high scenic amenity and areas of moderate scenic amenity.</p>	
P257		Michael McGlinchey	<ol style="list-style-type: none"> 1. Welcomes the zoning of an area from Barnes to Castlefinn as being 'unfavourable' for windfarm development. 2. Insists that the Cashelnavern and Finn Valley LCA remain not acceptable for wind energy development in final CDP. 3. Ten time tip height separation requirement should be retained in CDP. 4. Noise level limit of 43dB(A) is higher than WHO recommendation of 40dB(A). National policy fails to address low-frequency and infra sound caused by wind turbines. 5. Concerns raised that construction of windfarms could give rise to risks of soil failure and pollution. 6. Notes that the Cashelnavern and Finn Valley LCAs contain habitats and species of significant ecological importance and contends that wind energy developments would result in the loss of such important features. 7. Visual amenity - large wind turbines in this area would be visually overbearing. 8. Wind energy development in this area would result in unacceptable noise impacts. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P258	Conradh na Gaeilge	Séan Ó Murchadha	<ol style="list-style-type: none"> 1. This submission raises a number of matters relating to, inter alia; budgetary issues, the appointment of staff, the arrangement of events, the establishment of groupings, websites, scholarships, the development of services through the medium of Irish and support of Irish language plans for the various Gaeltacht language planning areas in the county. 2. It is contended that the provision of housing for Irish language speakers in the Gaeltacht is a necessity. 3. It is requested that a Coiste Logainmneachta be set up to provide Irish names for all new developments, housing estates etc. 4. Outlines the legislative framework of the P&D Acts under section 10(1)(2)(m) which provides that the development plan shall include objectives for the protection of the linguistic and cultural heritage of the Gaeltacht and that a non-compensatory reason for refusal includes that the proposed development will harm the linguistic or cultural heritage of the Gaeltacht. Suggests a number of examples to give effect to the requirement for development plans regarding section 10(1)(2)(m) as follows: <ul style="list-style-type: none"> ▪ Require a language impact assessment for every development proposal in the Gaeltacht and adopt a firm policy that the Planning Authority will not support development which will not promote the Irish language as the community language. 	<ol style="list-style-type: none"> 1. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 2 to 4. Refer to themed response on community, culture and the Gaeltacht contained in section 3.10 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<ul style="list-style-type: none"> ▪ Multi- residential development (2 or more units) in the Gaeltacht should be bound by occupancy and linguistic requirements. Refers to a sample linguistic requirement being available in the decision of An Bord Pleanala in relation to the Rinn Gaeltacht which provides for a set percentage of housing units to be occupied by persons with fluency in Irish. (The reference number of An Bord Pleanala decision is not provided in the submission). ▪ Occupancy and linguistic requirements should be implemented for a period of 15 years and applied to the head of household, and that the standard of spoken Irish sought will be level C1 of the European certificate in Irish. ▪ Regarding genuine local housing need, a household whose head has a level C1 of the European Certificate in Irish should be considered as having a genuine local housing need in a Gaeltacht area independent from any other criteria except the occupancy requirement for 15 years. 	
P259		Laurie J McGee	<ol style="list-style-type: none"> 1. Submission relates primarily to an unfinished estate in Dunfanaghy known as Church Meadows (map supplied), noting that the lands in question are ideally located approx. 300m from the Market Square of Dunfanaghy and proximate to local services and schools. The planning history of the site is summarised, noting inter alia that permission once existed for 44 holiday homes as a part of a larger overall development. The site is included within the settlement envelope for Dunfanaghy in the Draft CDP. It is submitted that, due to the fact that the site is identified as an unfinished housing estate, and that substantial on and off-site works have been completed, this portion of the unfinished Church Meadows housing estate should be considered as a committed housing site in respect of forward planning and meeting the housing needs of Dunfanaghy. Following on from this, it is contended that the site should be prioritised for development in the CDP 2018-2024. Reference is made to the Housing Agency's Guidance Manual on Unfinished Housing Estates (2011), Section 7; which addresses how unfinished housing estates should be considered in the context of core strategies and housing strategies. It is noted that there is currently limited capacity in the WWTP serving Dunfanaghy and Portnablagh; however, this WWTP is included in the IW Capital Investment Plan 2017-2021 and furthermore the Draft CDP resolves to pursue 'innovative resolutions to infrastructural deficiencies.....with a particular reference to....Layer 2B towns' (Section 2.8). It is noted that there is a WWTP in place for the Church Meadows development, with capacity for 600 p.e. 2. The rationale for Policy UB-P-24 is queried, stating that it effectively results in a moratorium on holiday home developments in towns like Dunfanaghy. It is contended that this policy is unreasonable in a location such as Dunfanaghy, which is a Layer 2B settlement for reasons of its tourism potential with respect to the Wild Atlantic Way. It is contended that a limitation on holiday home development in Dunfanaghy (and on the subject site) is unreasonable, as the site has many positive attributes such as proximity to the town centre and being adjacent to a local tourism asset, the Workhouse. 	1 & 2: Refer to themed response on core strategy and housing contained in section 3.1 of this report and also to themed response on site specific zoning requests contained in section 3.12. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
P260		Brian O' Byrne	<ol style="list-style-type: none"> 1. Requests that the boundary of the 'EHSA' area in the vicinity of Malinbeg be altered 'in order to avoid current homesteads'. A map is attached depicting proposed boundary of EHSA. 2. Requests that Malinbeg be included in Layer 3 of the settlement structure due to its strategic location at the end of the Wild Atlantic Way and proximity to Sliabh Liag. 	<ol style="list-style-type: none"> 1. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report. 2. Refer to themed response on core strategy and housing contained in section 3.1 of this report.
P261	Barry Mc Cullagh Architecture & Surveying Limited on behalf of Glenmac Developments Ltd	Barry Mc Cullagh on behalf of Glenmac Developments Ltd	<ol style="list-style-type: none"> 1. Submission made on behalf of Glenmac Developments Ltd. to seek inclusion of lands at Crievesmith, Letterkenny for 'primarily residential' purposes (map of lands provided with submission). The lands are currently zoned as Established Development and are located adjacent to 'primarily residential' lands. It is contended that the lands subject of the submission are ideally located, accessed via a public road, and may offer opportunities to link in with the adjoining multiple development to the south. A multiple development was previously approved at this location but has since expired. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P262		Seán Ó Beirne	<ol style="list-style-type: none"> 1. The heritage value of the area should be considered in any land-use planning decisions. 2. Improved access should be established to archaeological and historical sites and adequate signage provided. 3. Old homesteads including ruins (vernacular architecture), stone bridges, culverts, parapets and stone walls should be retained and protected. 4. Muckross Head should be designated as an SAC in light of its unique combination of flora and fauna, geology, archaeology and history. 5. The Bavin (Bavan)/Shalvey/Croaghbeg area should be accorded special Heritage Status in view of its landscape character, archaeology and history. 6. Kilcar town should be accorded Heritage Town status by virtue of its long established tweed and knitwear industry and close proximity to sites of archaeological and historical importance. 7. Practical support should be made available to owners of the remaining thatched cottages in the county so that the remaining examples of this important part of our built heritage can be retained. The thatched cottage also has an economic value from a tourism perspective. 	<ol style="list-style-type: none"> 1 to 3 & 6. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report. 4. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 5. Comments noted – however, the matters raised are outside the remit of the Draft CDP. 6. Although the provision and administration of funding programmes is not within the remit of the Plan, there are a number of programmes that have, in recent years operated in the County and which will assist in the safeguarding of the County's vernacular architecture. Recent programmes included the Built Heritage Investment Scheme and the Structures at Risk Scheme. Furthermore at a National level there is a grant available towards the cost of renovating thatched roofs of owner occupied houses which is

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
				administered by the Department of Housing, Planning and Local Government.
P263		Mai Mc Cann	1. This document appears to have been mistakenly entered as a submission in its own right - in actuality, it is an email to a third party concerning submission No. 262	N/A
P264		James Canavan	1. Table 18 entitled 'Rights of Way' in Appendix 3 of the Draft CDP should be accompanied by explanatory text as to where these rights of way are. 2. The CDP should have policy objectives seeking to have additional rights of way mapped and identified, particularly so for access to beaches and coastal areas and for this is to the benefit of recreation, walkers and tourists related to the Wild Atlantic Way.	1-2. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.
P265		Eunan Mc Carron	1. Submission states that a persons from rural Donegal should be considered favourably to build in another part of the rural county, provided all aspects are in compliance. States this should include for example persons from rural areas of Donegal Town moving closer to work in Inishowen or Derry and that this example should not be restricted by residency conditions regardless of the landscape category and references in particular areas that are in excess of 5 miles from urban centres. 2. Refers to statistics provided in the plan in relation to permissions granted and vacant properties and states that the statistics are not always reflected on the ground as permission is the first step in development and vacancy levels are a fall-out from the 2008 financial crisis. Notes extension of duration period of 5 years but states that the financial crisis is unprecedented and impacts are lasting longer. Also states vacancy figures may include holiday homes. 3. Suggests that favourable consideration should be given to people or potential purchasers for a site that has been granted permission in the past. Suggests these cases should be afforded an opportunity under the current improving economic conditions to get planning permission again. In addition, suggests that consideration should be given 'within 1 mile radius of the site' and provision of any community services such as schools, churches, halls. States these areas should be considered as hamlets. 4. States that RH-P-5 relating to 'Areas Under Strong Urban Influence' is extremely restrictive and should be expanded to immediate family members defined as sons, daughters, mothers, fathers, grandparents, brothers, sisters, aunts, nieces or nephews and also include cousins. Also state that in these areas consideration should also be given to people who are from Donegal and are returning from outside the Republic.	1 to 4. Refer to themed response on rural housing contained in section 3.5 of this report.
P266		Michael Doherty	1. Requests the land (submission provides photographs but no map) between An Grianan Of Aileach and the main road between Burt Chapel and St Marys Hall be designated as an area of 'Especially High Scenic Amenity' for the following reasons: <ul style="list-style-type: none"> ▪ Unrestricted development would have significant impact on views from Inch Lake 	1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The location of the lands were not identified in the submission and

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>Wildlife Reserve, Slab Road, main Bunrana to Derry road and main Letterkenny to Derry Road.</p> <ul style="list-style-type: none"> ▪ Grianan an Aileach is a major tourist destination and Inch lake Wildlife reserve is also attracting lots of visitors and the landscape looking up to the Grianan Fort must not be developed any more. ▪ Burt Chapel was voted Building of the Century by the RIAI and the landscape between the chapel and the fort should be kept free of development. ▪ Notes policy AH-P-3 relating to protection of character, setting of and views from national Monuments and Recorded Monuments. 	therefore they cannot be mapped.
P267		Billy Moyles on behalf of Annie May and Sean Gallagher	<ol style="list-style-type: none"> 1. Requests that lands identified in the submission be amended on Map 8.2.1 (Wind Energy) from 'Acceptable for Augmentation of/ Improvements to Existing Windfarms' to a new zone entitled 'Acceptable in Principle for Wind Farm Development' for the following reasons: <ul style="list-style-type: none"> ▪ There are no wind turbines either existing or permitted on the land in question. ▪ The land fulfils all of the criteria of 'Acceptable in Principle for Wind Farm Development' including environmental, heritage, landscape as well as other factors including grid connections, infrastructure and energy potential. ▪ The identification of the land in question as 'Acceptable in principle for Wind Farm Development' would ensure the plan is compliant with the Wind Energy Development Guidelines 2006 as there is currently no zoning of this title in the Draft CDP. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P268	GVA Planning on behalf of Tesco Ireland Ltd.	Simon Bradshaw GVA Planning on behalf of Tesco Ireland Ltd.	<ol style="list-style-type: none"> 1. Submission is made on behalf of Tesco and it requests that zoning maps be updated to provide greater clarity on the areas affected by the flood risk designation including improving the illustration of the flood risk areas and providing details on whether each area is Flood Risk Zone A, B or C. 2. Request that a new policy be introduced that specifically supports commercial development in Letterkenny provided it accords with the Flood Risk Management Guidelines 2009. 3. Notes that while CFRAM mapping is a valuable resource, details of flooding risk are important to be provided as part of the development plan as this is the primary document consulted when considering planning applications. 4. Refers specifically to map 12.1B in (land use zoning map for Letterkenny) wherein Letterkenny Shopping Centre is in an area at risk of flooding however the development plan does not provide details as to which flood zone would apply to town centre and this makes it difficult to assess future potential. 5. Request that the flood risk management policies should be sufficiently flexible to allow for the assessment of commercial development having regard to existing operations as well as existing and potential future mitigation measures. State that policies should not prevent the release of strategic development lands especially in the case of Letterkenny town centre as a 'linked centre gateway.' 6. Submission suggests the following as an example of a positive policy for Letterkenny: 	1 to 6. Refer to themed response on flood risk contained in section 3.4 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			'Commercial development proposals in the Letterkenny Town centre area which accord with the appropriate zoning as well as the requirements of the Flood Risk Management Guidelines, 2009, will generally be supported by Donegal County Council.'	
P269	Shanaway Energy Ltd	Gearoidín Ní Charthaigh	<ol style="list-style-type: none"> 1. Submission states that the measures set out in the wind energy objectives and policies are in breach of planning policy guidance and do not maximise wind energy potential. 2. Welcome the new zoning designation 'Acceptable for Augmentation' and note that the company's proposed project at Garvegort Glebe is located within this designation however states that the area marked as 'Acceptable for Augmentation' is very restrictive. State that efficiency is increased if spacing between turbines is increased and therefore request that the area 'Acceptable of Augmentation' is increased so that turbines can be placed within 800m of the existing locations of each of the permitted turbines. 3. Requests deletion of the references to ten times tip height set back distance and states that this is not compliant with national guidelines. Describes the approach as a negative approach. A copy of the 'draft preferred approach' is attached to the submission. 4. Also states that the company have serious concerns regarding the evidence base used in order to draft map 8.2.1 (Wind Energy). State that the approach is an arbitrary and negative one to preclude future greenfield wind farm development in the country and it reverts back to variation No 2 in relation to set back and FWPM. States that the experience in windfarms shows that it is possible to undertake successful FWPM surveys and assessment and to design mitigation measures to protect the species. Note that wind energy has been singled out in this approach. Also notes that the proposed blanket ban is contrary to EU Commission advice on the implementation of Natura 2000 regulations. Also notes that the similarity in the explanatory text in the Draft CDP as compared to the existing CDP in relation to the methodology for identifying areas as 'Open to Consideration.' States that given the similarities, it is unclear how there is a vast difference in the areas identified. 5. Request that clarity is provided on other matters that were considered in drafting map 8.2.1 so as to either provide the evidence base or to revert to the existing map in the current CDP. 6. Refers to the section 28 statement in the Draft CDP regarding compliance with the Wind Energy Development Guidelines 2006 and note the reference to a non- executive report. State that it is not clear what scientific evidence is being put forward by the Council to justify the ten times tip height set back restrictions. 7. Notes a number of elements of the Circular issued to Planning Authorities as follows: <ul style="list-style-type: none"> ▪ Local Authorities are obliged to acknowledge and document national policy on renewable energy and to indicate how the plan will contribute to realising overall national targets particularly where a proposal varies a mandatory set back distance. ▪ That it shall be a material consideration in the SEA if a new or varied set back distance would create a significant limitation or constraint on renewable energy projects. The submission notes the Environmental Report does not appropriately address Objective E-O-6 in relation to setback. 	1 to 14. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>8. The submission provides detailed information regarding EU and National renewable energy commitments, climate change policy and targets, progress towards national renewable energy 2020 targets, security of energy supply and competitiveness of wind energy and local benefits.</p> <p>9. Submission welcomes positive policies and objectives including E-O-5 and E-P-10 but states that E-O-6 and its reference to set back of ten times tip height is not in compliant with national policy and is without credible scientific evidence base.</p> <p>10. State the text at page 41 which reference to specific CJEU case does not constitute scientific evidence. Also outlines that every wind farm operates through a SCADA system which monitors turbines including power generation, faults, alarms, and grid interface.</p> <p>11. Refers to two reports referenced on page 128 in relation to noise and states that including a reference to a report does not constitute sufficient evidence base for a material deviation from the national standards for setback.</p> <p>12. States that the industry's analysis of the existing CDP area 'Open to Consideration' taken with a nominal set back of 1.35km, indicates that only 1.5% of the County remains 'open for consideration.'</p> <p>13. States that E-P-12(b) gives rise to concerns as the restriction of extension to wind farms of up to 20% is very restrictive.</p> <p>14. Submission encloses a copy of the section 31 Ministerial direction in respect of variation no. 2.</p>	
P270	Barry Mc Cullagh Architecture & Surveying Limited on behalf of Ms Lorna Barron	Barry Mc Cullagh Architecture & Surveying Limited on behalf of Ms Lorna Barron	<p>1. Submission requests amendment of zoning in Ballybofey-Stranorlar from 'Amenity' to provide for other opportunities for single or multiple residential development or industrial/commercial development. States that the amenity zoning is wholly restrictive particularly given surrounding mixed uses. States that the lands were formally a GAA training ground however a lease on the lands has lapsed and the tenant no longer occupies the property.</p>	<p>1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P271		Lisa Doherty	<p>1. Submission requests that the ten times tip height set back in relation to windfarms is retained and that the Cashelnavern and Finn Valley LCA's are zoned unacceptable for wind farm development for the following reasons:</p> <ul style="list-style-type: none"> ▪ The areas are of great ecological importance. ▪ The extent of natura 2000 sites including Croaghonagh Bog, and NHA's and pNHA's. ▪ Impact on landscape and visual amenity ▪ Impact of shadow flicker. ▪ Impact of noise within a low noise environment. Notes national guidelines could permit up to 43db and states that this would be unacceptable in the low noise environment. ▪ Potential to result in property devaluation 	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p>
P272	Energia Renewables	Peter Lefroy	<p>1. Submission requests that map 8.2.1 in the Draft CDP is not implemented and that the existing map in the current CDP be maintained as the wind energy map for the county and</p>	<p>1 to 9. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>that the relevant text in relation to setback distances be removed.</p> <ol style="list-style-type: none"> 2. Submission notes E-O-5 and E-P-10 which are supportive of wind energy development but also note E-O-6 which continues the policy approach regarding a setback of ten times tip height of turbines from residential properties and other centres of human habitation. Submission states that this is a negative approach and is not compliant with the Wind Energy development Guidelines and the 'Preferred draft approach.' 3. Submission refers to the section 28 statement and a non- executive report and states that it is not clear what scientific evidence is being put forward by the Council to justify the setback position. 4. States that there is no linear correlation between distance of a dwelling from a noise source and that the proposed method to mitigate impacts is therefore inappropriate. 5. States that proximity of turbines to dwellings should be on a case-by-case basis where scientific study informs the process. Also notes that the proposed wording removes the right of a dwelling occupier to consent to a turbine at a closer distance than prescribed. 6. Submission notes text on page 41 in relation to recent CJEU judgement case and states that the text suggests that an increased setback may be required for other reasons. 7. Submission acknowledges the reference to the blade throw incident at Corkermore Windfarm and note that the management of Corkermore Windfarm is under the management of the company. Submission outlines that a full investigation has been completed in relation to the incident and it shows that mitigation measures at the time were fully appropriate in containing the incident. Also notes that the debris was limited to the ground below the turbine and a further study showed that in a worst case scenario the debris would only have spread over a fraction of the mandatory separation distance of 500m as set out in the Guidelines. 8. Regarding map 8.2.1, submission states that the reduction in areas 'open to consideration' will result in greenfield development of economically sustainable windfarms as not achievable when taken with setback distance. 9. Submission states that the proposed mapping amendments would eliminate sites that otherwise would be suitable and viable for development and in turn jeopardise Ireland's ability to national targets for renewable energy. 	
P273	Carr & Company on behalf of Swannet Gundry	Michael Carr & Company on behalf of Swannet Gundry	<ol style="list-style-type: none"> 1. Submission requests that the boundary of the settlement envelop of Killybegs is extended to include existing buildings described as the Swannet-Gundry buildings and other buildings and that additional lands be zoned as 'Enterprise (Industrial/ Employment). A map is attached to the submission. 	<ol style="list-style-type: none"> 1. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.
P274	SSE	Elizabeth Swanwick	<ol style="list-style-type: none"> 1. Highlight the need to support the development of clean energy sources such as onshore wind, to help deliver the key strategic objectives of the CDP. 2. Notes the significant contribution that the wind energy sector makes to the local economy 	<ol style="list-style-type: none"> 1 to 12. Refer to themed response on renewable energy contained in section 3.7 of this report.

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			<p>through local and foreign direct investment, job creation, increased demand for local services, community funds and Local Authority rates. The development of renewable energy is not only supportive of achieving domestic and international emissions targets but also represents an opportunity for economic, social and environmental benefits for the regions in which it is developed.</p> <ol style="list-style-type: none"> 3. Welcomes the proposal to facilitate the allocation of parking spaces for electric vehicles in accordance with best practice. Consideration should be given to the National Policy Framework on Alternative Fuels Infrastructure for Transport in Ireland, 2017-2030 (Chpt. 5). 4. Support the aim to develop Donegal as a centre of excellence for renewable energy - argue however, that the restrictions placed on wind energy are disproportionate in comparison to the requirements for other forms of development (Chpt. 8). SSE consider that the areas identified as 'open to consideration' have been unduly limited and further believes that there are other areas where windfarms can be satisfactorily built with minimal social and environmental impacts. 5. SSE is encouraged by the CDPs consideration of repowering, extension and reapplication. Maintaining low carbon renewable generation in those areas which have previously received planning and been identified as acceptable for development is highly desirable. SSE propose that the current use of a site as a windfarm should be a material consideration in any repowering proposal. 6. SSE suggest that the CDP should adopt a pro-active approach to the co-location of other forms of low carbon generation or technologies which may increase the efficiency of any existing renewable technology, including potential changes to the layout of existing assets to accommodate this. This would enable more efficient, lower cost, stable energy generation in the future. 7. Wind energy development is subject to an outright exclusion from EHSA areas and from 6 FPM catchments - this appears to differ from the approach adopted for other forms of development, which are not subject to an outright exclusion. SSE argue that no such exclusion should apply to wind energy developments, in the interests of consistency. 8. The designation of such a large area of the county as 'not acceptable' will result in a failure to maximise the wind energy potential of Donegal and as such is not in line with the 2006 Wind Energy Guidelines (Section 3.4). It will also make it more difficult to achieve the objectives of the Draft CDP in terms of renewable energy. 9. The CDP must be prepared having regard to the 'interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change' (2017). SSE consider that the CDP should reflect Government policy, with particular reference to 'setback' requirements for turbines. 10. SSE acknowledges the intention to support appropriate auto-producers/micro-producers and notes that it will be necessary to ensure that both cost effectiveness and social equity in terms of grid infrastructure are maintained. 11. It is encouraging to see the Draft CDP considering ways to diversify Donegal's renewable 	

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			<p>energy portfolio via the development of offshore wind. Marine Spatial Planning is needed to ensure efficient and optimal deployment of offshore wind and related grid infrastructure in waters close to demand centres.</p> <p>12. The CDP should support the adoption of effective strategies to ensure that homes are connected to appropriate energy networks and/or sources. SSE would welcome steps in the CDP to support the conversion of homes to an appropriate electric heating solution.</p>	
P275		Marie Scanlon	<p>1. Supports the identification of the area of Cronalaghey, located within the Cashelnavern Border and Uplands LCA40, as 'Not favoured' for wind energy together with the ten- times tip height setback and references to supplementary reports in relation to wind energy. Provides the following additional information in support:</p> <ul style="list-style-type: none"> ▪ The decision to identify the area as 'Not favoured' will safeguard the community and the area. ▪ The community in the area aims to preserve the unspoilt landscape from inappropriate developments. Donegal is saturated by windfarms and has contributed more than its fair share. ▪ The Cashelnavern LCA adjoins County Tyrone where there are numerous windfarms and it should be considered that County Tyrone forms part of the views of the Cashelnavern LCA. States that the LCA40 description is vague in comparison to other LCA's. ▪ Notes the recreational value of the area in relation to Trusk Lough, walkways, cycleways, fishing and birdwatching. ▪ States that tourism in the area remains untapped and reference the impact of turbines on tourism.. ▪ Considers the priority should be the repowering of old wind turbines as opposed to developing new sites. <p>2. Regarding climate change and afforestation, the submission suggests over reliance on planting non-native conifers should be examined and to reassess the return of Irish Woodlands to fully engage in a forest management strategy.</p>	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.</p> <p>2. Comments noted – however, the matters raised are outside the remit of the Draft CDP.</p>
P276 (Late)		Mary McGlynn	<p>Requests that windfarms no longer be permitted or if that is not possible requests that turbines be at least ten times the rotor size away from residential properties.</p>	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>
P277 (late)		Damien McCallig	<p>1. Notes that the CDP is a critical part of translating overall national policy including policy on energy, in a manner that supports the achievement of our obligations relating to climate change and renewable energy.</p> <p>2. The balance struck by DCC in setting clear areas where wind farms can be developed and by setting parameters for turbine heights, ensures that both ecologically sensitive areas and residential amenity are protected.</p> <p>3. The Development Plan acknowledges and documents national policy on renewable energy - to this must now be added the Governments National Mitigation Plan, 2017. The county has</p>	<p>1. Refer to themed response on renewable energy contained in section 3.7 of this report.</p>

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
			<p>a long history in contributing to national targets on renewable energy and the Draft CDP provides further areas zoned as 'open to consideration' for wind energy, thus clearly providing for the continuation of the county's contribution to meeting national targets on renewables.</p> <ol style="list-style-type: none"> 4. A concern is raised that some areas zoned for 'augmentation' do not have any built windfarms on them and have been incorrectly zoned - this should be addressed before the Plan is finalised. 5. The Draft Plan has been through SEA and AA and the '10 times tip height setback' is a continuation of that from the CDP 2012-2018 (as varied). The 2012 Plan has been through a robust variation process and High Court scrutiny before setting the 10 times tip height setback distance and appropriate zoning of the freshwater pearl mussel sub-basin catchments. Therefore, the requirements of the specific planning policy requirements outlined in the interim guidelines on renewable energy (2017) have been addressed. 6. Concern is raised in relation to the inclusion in the Plan of a note to the effect that "a minimum setback distance of ten times tip height (for noise-related reasons) which....inevitably result in setback distances being significantly in excess of the 500m guide distance", is somehow in contravention of the 2006 wind energy guidelines. It is claimed that independent scrutiny found to the contrary, therefore references to the perceived contravention must be removed. 	
P278 (Late)	Gallaghers Irish Premium Oysters	Edward Gallagher	<ol style="list-style-type: none"> 1. As an aquaculture business providing 23 jobs, Gallaghers Irish Premium Oysters are extremely disappointed with the treatment of their industry in the Draft CDP. 2. Although fleeting reference is made to support for onshore/ancillary aquaculture development, it is extremely disappointing to note that primary production of aquaculture products is not supported by any objectives or policies in either Chapter 4 (Economic Development) or Chapter 10 (Marine) and it appears that the Council are not supporting this business. Gallaghers request that this position be reviewed and corrected in order to align the Plan with national and regional policy. 3. A concern is raised in relation to the massive expansion of coastline areas designated as EHSA, without due consideration of the nature of the coastline and its current level of development. Gallaghers do not agree that their area falls within the definition of EHSA. 4. The coastal EHSA extensions appear to be a blanket classification and concerns are raised that such designation will restrict economic development in rural coastal locations and thus fail to support sustainable communities in these locations. 	<ol style="list-style-type: none"> 1. Refer to themed response on the marine resource and coastal management contained in section 3.9 of this report.
P279 (Late)		Maranna Sweeney	<ol style="list-style-type: none"> 1. Serious concerns raised in relation to the enormous turbines proposed for the Carrickaduff windfarm. 2. Strongly requests that the Council stand firm on the '10 times tip height' setback distance as stipulated in the Draft CDP. 3. As the proposed turbines are 156.5m high, it is unacceptable that the wind energy 	<ol style="list-style-type: none"> 1 to 6. Refer to themed response on renewable energy contained in section 3.7 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

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			<p>development guidelines only recommend 500m from the nearest dwelling.</p> <ol style="list-style-type: none"> 4. The Draft CDP does not include detail on infrasound but includes information on a non-executive report which details findings on blade throw, turbine collapse and fire. The non-executive report alone justifies the implementation of the 10 times tip height setback as a prudent precautionary principle. 5. LCA 40 Cashelnavern Border and Uplands and LCA 14 Finn Valley - Requests that the Council retain both these areas as unacceptable for wind energy development. Both areas are rich in biodiversity and wind energy development would cause significant loss to important habitats. 6. The scale of the proposed Carrickaduff turbines is totally at odds with the natural landscape in these areas and would result in adverse noise impacts, shadow flicker and property devaluation. 	
P280 (Late)		Neil Martin	<ol style="list-style-type: none"> 1. Requests that the restrictive policy in the Draft CDP be amended so as to positively encourage wind energy development in the County and in Inishowen. 2. Asks DCC to delete constraints set out in Section 8.2 of the Draft and to limit turbine setback distance from dwellings to 4 times blade height of turbines. 3. Fails to understand why Freshwater Pearl Mussel catchment areas are prohibited for use for wind energy developments but not for other developments such as roads, quarries etc. EIA could be used to scientifically assess potential impacts on FPM rather than imposing an outright blanket and discriminatory ban. 4. Asks that the previous energy zoning map of 2014 be reinstated. Map 8.2.1 in the Draft provides almost no new land for wind energy development and this will sterilise this importance indigenous economic and renewable sector in Co. Donegal. 5. The hostile approach to wind energy in the Draft CDP contravenes national, government and European policies. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P281 (Late)	Donegal South Forum Ltd.	Molly Reynolds	Notes that it is important that practical support be given to owners of the remaining thatched cottages in the county as these structures add to the tourist appeal of the county and are an important part of our heritage. It is important to preserve these thatched cottages.	<ol style="list-style-type: none"> 1. Although the provision and administration of funding programmes is not within the remit of the Plan, there are a number of programmes that have, in recent years operated in the County and which will assist in the safeguarding of the County's vernacular architecture. Recent programmes included. Recent programmes included the Built Heritage Investment Scheme and the Structures at Risk Scheme. Furthermore at a National level there is a grant available towards the cost of renovating thatched roofs of owner occupied houses which is

Ref	Organisation or Group	Name	Summary of points raised in submission	Response and Recommendations arising
				administered by the Department of Housing, Planning and Local Government.
P282 (Late)		Anne Harrison	<ol style="list-style-type: none"> 1. Supports the Draft CDP, in particular the more realistic restrictions to be placed on the location of wind turbines. 2. Asks that the Council stand firm in refusing planning permission for building on restricted areas: people do not drive along the Wild Atlantic Way to find house building on the edge of the sea, nor turbines over Kinnego Bay. 	<ol style="list-style-type: none"> 1. Refer to themed response on renewable energy contained in section 3.7 of this report.
P283 (Late)		Charlotte du Plessis	<ol style="list-style-type: none"> 1. Regarding the Areas of High Scenic Amenity (and particularly the Falcarragh to Meenlaragh SPA), consideration should be taken of the fact that this is a rural area with a high population density. People live and work in these areas and have social needs that should not be ignored within the CDP. The local community hope that they will not be at a disadvantage when/if there is a need to utilise their lands for crops, drainage, land improvement or to build a house. 	<ol style="list-style-type: none"> 1. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.
P284 (Late)	Mary Carey	Mary Carey	<ol style="list-style-type: none"> 1. Refers to lands in St. Oran's Park, Buncrana which are zoned 'amenity/recreation' (map supplied). Requests that the lands retain this zoning in the CDP. The 'amenity/recreation' zoning has been retained to date in the Draft CDP. The subject lands represent an important and significant amenity area in the town and must be protected. These amenity areas are also increasingly important natural water attenuation features. 	<ol style="list-style-type: none"> 2. Refer to themed response on site specific zoning requests contained in section 3.12 of this report. The extent of the lands referred to in the submission can be viewed in Appendix B of this report.

3 Summary of the issues raised in the Elected Representatives submissions

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
LR1	Inishowen Elected Members	<ol style="list-style-type: none"> 1. Submission relates to a number of items raised at a recent meeting of the Inishowen Councillors and details how the proposed Draft Plan could have an adverse effect on Inishowen if a number of policies remain in the Plan. 2. Regarding CS-P-5 states the sequential development of small towns will not work in Inishowen unless a number of hubs in town centres and areas within towns are rezoned. 3. Areas of EHSA should remain with same wording as previous plan with no policy restriction or recommendation. 4. Regarding ED-P-3 states policy should allow economic development in rural areas without ruling out settlement areas first 5. Regarding T-P-4 states policy needs to be removed as added TII restrictions are continually updated and regarding T-P-22 states the same status as T-P-20 must be given in support of funding for Greencastle Port 6. Ribbon Development is not working, interpretation and implementation by Development Management differs from the spirit that the policy was written by forward planners 7. The members raise major concerns regarding stand alone treatment systems as IW are refusing to take over stand alone treatment systems putting emphasis on developers to set up Management Companies, creating value for money and a less grief scenario, encouraging development in towns with existing infrastructure. 8. The members raise the question of how the council intend to develop social housing in the 3 towns of Buncrana, Carndonagh and Manorcunningham that require sequential development, and how the Council plan to develop social housing new builds in Inishowen without creating a Tier system. 	<ol style="list-style-type: none"> 1. Noted. 2. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 3. Noted. However, it is considered that the Draft Plan strikes an appropriate balance between protecting our most scenic landscapes, whilst also seeking to facilitate development as and where appropriate. Thus although the Plan does require caution in the consideration of development within the EHSA's, it does not preclude development. The following objectives and policies are examples of note in this regard (underline has been added for purposes of report): <ul style="list-style-type: none"> a. Policy NH-P-6: '...to protect areas identified as EHSA...only developments assessed to be <u>of strategic importance or developments that are provided for by policy elsewhere in this plan shall be considered.</u>' b. Objective ED-O-5: To promote appropriate rural economic development by encouraging diversification that supports the growth of emerging rural enterprises functionally related to the countryside. c. Policy ED-O-7: To facilitate the appropriate development of tourism throughout the County through the support of sustainable tourism projects...' Members will also note their decision to omit any reference to the EHSA in the core rural housing policies RH-P-1 to RH-P-5. 4. Refer to themed response on economic development contained in section 3.2 of this report.

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
			<p>5 and 7. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p> <p>6. Refer to themed response on Rural Housing.</p> <p>8. Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p>
LR2		<ol style="list-style-type: none"> 1. Submission refers to the National Planning Framework and states that Donegal and the entire North-West have been let down. Feel this will have an adverse effect on rural communities citing language such as: "It will be necessary to protect some rural areas from unsustainable growth pressures as experienced in the recent past, whilst ensuring that there are attractive alternatives to urban generated rural development in the hinterland of cities and larger towns." 2. In the context of encouraging development in local towns, at present this can only happen where infrastructure is already in place; there has not been proper infrastructure within these towns to guarantee that the NPF will be fair and viable to rural people. 3. Raise concern that Donegal voice is never heard, and: <ul style="list-style-type: none"> ▪ National and Regional policy supports large cities such as Cork, Dublin as examples and financing of this is at the expense of rural communities. ▪ Uncertainty of Brexit, Derry City and NI situation, the county could become isolated and confined within planning regulations having a negative effect on the development of infrastructure affecting direct investment. ▪ Draft Plan policies coupled with NPF could leave Donegal as a 'tourist garden' for the rest of the country with development opportunities only in the major towns. 4. Express thanks to the CPU for their co-operation, and are encouraged by the CE in his presentations. Request more co-operation and an ongoing dialogue with the planners regarding the implementation of policy and state that due to the different physical and cultural landscape within the county that one policy does not fit all. Also request a specific and detailed workshop outlining signage policy contained in Chapter 9 of the Draft Plan. 5. Request that the Retail/Commercial policy be reviewed with regard to the following matters: <ul style="list-style-type: none"> ▪ The submission details the existing policy context and proposes that infrastructural capacity must include proper road capacity and traffic management. States there is a difficulty of accessing town centre retail units that should have been considered. Suggests that small towns be promoted for town and large retail outlets, given the easy access. ▪ Submission refers to pages 49, 50 and 51 of the Draft Plan that refers to table 4.2.1: Retail types and suggests that restrictions placed on towns other than tier 1 and 2 have a detrimental and negative effect on the remainder of towns. Suggests that smaller towns can cater for a large volume of commuting traffic associated with a single large factory or large retail unit. Requests 	<ol style="list-style-type: none"> 1 to 3. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 4. Noted, and the commitment is given in relation to further workshops with Members on the implementation of the Plan. 5. Refer to themed response on economic development contained in section 3.2 of this report. 6. Refer to themed response on core strategy and housing contained in section 3.1 of this report and also to themed response on economic development contained in section 3.2 of this report. 7. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. 8 to 9. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 10 and 15. Noted. Refer to Themed Response on rural housing and particularly the reference therein to deliberations on the 'The Flemish Decree' case and the judgement of the European Court of Justice in this regard and that the forthcoming National Planning Framework will further assist in informing the revision of the 2005 Guidelines; Hence the rural housing policies of the County Development Plan are likely to be subject to variation following the publication of

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
		<p>that the following text be removed from Policy ED-P-3 of the Draft Plan: "the development proposed could not be located in a settlement in line with this policy".</p> <ul style="list-style-type: none"> ▪ Requests that all towns are open for retail units on a case by case basis and policies RS-P-1, 2, 3, 4, 5 be reworded accordingly. ▪ Request that small businesses that provide a service to the local area should be permitted in the rural area if the infrastructure supports it. <p>6. Provision of housing in urban settlements: detail existing policy and request that the sequential assessment for retail and housing be removed and replaced with a report that justifies the project and its location. Do not accept the argument made on page 50 of the Draft Plan which states "Applications for individual retail units outside a town centre or on its edge should generally be discouraged in order to reduce the number of car journeys", suggest that all these journeys must be made to the town centre as there is no-one living in the town centres.</p> <p>7. States that Members are not happy with policy T-P-4 for the reason that they feel it kills off all development that intensify access onto NP roads where speed limits are greater than 60kph e.g. Bridgend to Buncrana roads. Request removal of policy T-P-4 from the Draft Plan</p> <p>8. Query how the council envisage development proceeding in towns that have a sewer treatment system deficiency without capacity for additional loadings, e.g. Bridgend.</p> <p>9. Request that policy CS-P-5 be removed/ revised to reflect the need of smaller towns</p> <p>10. Only policies RH-P-1, RH-P-2, RH-P-6 and RH-P-6 should be adopted in relation to rural housing; planning should not be based on occupation but how it affects this area. Also in relation to rural housing the submission makes the following comments:</p> <ul style="list-style-type: none"> ▪ Propose that a person living within a settlement should be allowed to build for a distance up to 5 miles outside town. ▪ Request that wording of policy RH-P-2 apply rather than that proposed in RH-P-11 and the wording should be amended to reflect same. ▪ Request that word 'holiday home' be removed from policies RH-P-3 and RH-P-4 <p>11. Request the removal of the requirement for people to certify the performance of a percolation area before they move in to be removed from policy WES-P-11.</p> <p>12. Request that pearl mussels only be in the plan if they are needed and if so policies should be restricted to the river basin areas only.</p> <p>13. Request that removal of hedgerow and road set back along certain county roads should be considered individually and have exemption where there are no traffic concerns.</p> <p>14. Suggests that policy T-P-16 be relaxed as it is very restrictive and request T-P-22 be given the same recognition as T-P-20 so Greencastle port receives the same recognition as Killybegs.</p> <p>15. In relation to rural housing the submission makes the following comments:</p> <ul style="list-style-type: none"> ▪ Request that Appendix B include a design that would not preclude all development as a result of policy NH-P-16. ▪ State that ribbon development policy be re-written so that applications are considered on an individual basis. 	<p>the new Rural Housing Planning Guidelines and will be the subject of further debate at that time.</p> <p>11. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p> <p>12. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.</p> <p>13 to 14. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p> <p>16. Refer to themed response on Tourism.</p> <p>17. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report.</p> <p>18 to 21. Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p> <p>22 to 23. Refer to themed response on core strategy and housing contained in section 3.1 of this report and also to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p> <p>24 to 25. Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p>

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
		<ul style="list-style-type: none"> ▪ Suggest guidance on the wording 'Sub-Urban and Piecemeal Development' a language used by DM in refusals outside settlement boundaries. 16. State that caravan parks and campervan parks should be promoted with no restrictions within are offering tourism opportunities and subject to technical standards. 17. Request that the owners of all NIAH structures be provided with information on these structures in the context of policies BH-P-1 and BH-P-18. 18. Request clarification in relation to paragraph (b) under multiple developments page 20, within the Draft Plan, regarding potential development in towns that have unfinished estates. 19. Request clarification on how the council propose to provide social housing in towns without sewage capacity. 20. State that the NPF and technical standards in this country provide enough legislation for the control of development without adding to them. 21. Submission sets out a scenario of how the Draft Plan would close down rural towns and villages. 22. Request a complete report/analysis of the 65 towns of the core document of the existing CDP 2012-2018 as to which towns have infrastructure in place today to permit the granting of 10 additional dwellings within each town. Rationale is in relation to takeover of infrastructure by Irish Water. 23. 13 towns that have no sewage capacity in Inishowen are listed as are the 2 towns of Manorcunningham and Carndonagh that have capacity to accommodate 10 or more dwellings. 24. Raises concern over the Housing waiting list (+2300) stating that the EC have criticised the lack of housing in Ireland and that the NPF will not improve this trend without the revenue to improve infrastructure. 25. Questions how it is proposed to achieve the population target of 200,000 using a regional population balance with the small investment arriving at present. 	
LR3	Cllr John Campbell	<ol style="list-style-type: none"> 1. Submission relates to two specific issues, namely Part A: Appendix 2-Section 28 Statement and Circular letter PL 5/2017 & 'Interim Guidelines'. 2. Regarding Part A: Appendix 2- Section 28 Statement the following points are raised: <ul style="list-style-type: none"> ▪ States that page 41, paragraph under heading 'Wind Energy Development Guidelines 2006' and the opinion of the planning authority, were not as included in the working draft that was approved for publication as a draft for public consultation resolved by the members at the meeting of 02/05/17, and cannot therefore be said to be the opinion of the PA. States that the paragraphs would be more accurately described as advice of the executive as described in section 132(3) of the Local Development Act (as amended); States that these paragraphs should be described as the position of the PA and that they would have been required to be put before the elected members for their consideration prior to inclusion in the published draft. ▪ States that the members mandated the continued inclusion of Variation No.2 of the existing Plan at the meeting of 27/03/17 so the working draft would properly reflect its true and accurate relationship to the existing plan. States that subsequent to this the executive presented a report entitled 'Report to Plenary Workshop on 12/04/17 in relation to the working Draft Plan; the section headed 'Option 2', outlining the executive's opinion of the necessary amendments required for 	1 to 3. Refer to themed response on renewable energy contained in section 3.7 of this report.

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
		<p>continuance of elements of variation no.2, and the paragraphs now included in the Draft Plan do not reflect the suggested additional amendments to the working draft as outlined in that report. Suggests that it would not appear appropriate for the executive to go behind their own advice/opinion offering reasons after the fact, and cites case law.</p> <ul style="list-style-type: none"> ▪ States that the final paragraph under the heading 'Wind Energy Development Guidelines, 2006' on page 41 incorrectly records the conclusions of referenced report entitled 'Submission in relation to the amendment document 'OPTION 3 Revised' to the Working Draft County Development Plan 2018-2024', and that this paragraph does not accurately reflect the stated basis for the adoption of these measures. States that the report considered and adopted by resolution of the elected members of the PA concluded the following: 'From the analysis and evidence base and determinations above it has been shown that variation no.2, subject to the adoption of the amendments 'OPTION 3 Revised': - Provides a balanced approach to wind farm development - Can provide for delivery on Irelands renewable energy targets - Is based on evidentiary analysis - Is not consistent with plans, policies or guidelines issued by the minister - Provides for the proper and sustainable development of the area <p>And therefore can be incorporated into the development plan in compliance with the requirements of the Planning and Development Acts.</p> <ul style="list-style-type: none"> ▪ States that should it be the consistent opinion of the executive that it is not possible to implement section 5 of the referenced guidelines, a more robust reasoning by the PA must be given to properly satisfy the requirements of Section 28(1b)(b) of the Planning and Development Acts. ▪ States it is to be gleaned from the considered report of May 2nd should it be necessary to record it in the body of the plan under this particular heading. Refers again to case law when deciding whether the inclusion of the entirety of the report is necessary or whether reference to the report would suffice. ▪ Requests that the executive present alternative drafts of both interpretations outlined in the submission for elected members consideration in the CE report. <p>3. Regarding Circular Letter PL 5/2017 & Interim Guidelines' states these were issued after the period of consultation on the Draft Plan had commenced, and as such it is appropriate to scrutinise their content against the elements of the plan covered by the report entitled 'OPTION 3 Revised', suggesting that circular PL 5/2017 can be described as an advisory and explanatory circular. Makes the following specific points:</p> <ul style="list-style-type: none"> ▪ Submission lists some of the content of the circular. ▪ Acknowledges that 3 of the national policy documents named in section 4(1) of the national guidelines are referenced in the environmental report and states that the National Mitigation Plan was published after the draft plan issued and this should be referenced in the CE report. Suggests that this minor amendment to the Environmental Report will fulfil the specific planning policy requirement set out at 4(1) of the interim guidelines. 	

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
		<ul style="list-style-type: none"> ▪ Submission makes a number of specific observations on the relationship between the wind energy strategy contained in the draft plan and the Interim Guidelines, stating that exclusion of FWPM and proportional setback distance are not new to this draft plan but are a continuation of established policy. ▪ Submission states that the policy elements that have been introduced are E-P-12, E-P-20, E-P-21 and the definition of auto-generation, that E-P-20 and 21 are general natured and screened for SEA and NIR and do not interact with the Interim Guidelines. ▪ Sets out that E-P-12 and the definition of auto-generation will expand the capacity of the functional area of the plan for potential delivery of renewable energy, more than the existing plan, achieving this in a managed and sustainable way. ▪ Referencing the report considered by elected members on 2nd May, states there is a potential energy quantum of 84MW deliverable representing an additional potential of 20% compared to existing installed capacity. Based on SEAI methodology this equates to greenhouse gas emission saving of 102,000tonnes of CO2 with an estimated saving of €12.69m due to fossil fuel and CO2 displacement. ▪ States that it is irrational in this instance to follow advice contained in PL 05/2017 as it would have the effect of diminishing the potential wind resource in the functional area of the plan. ▪ Referencing specific planning policy set out at 4(2) of the Interim Guidelines the report considered by the elected members on the 2nd May (referenced above) contains a comprehensive analysis of the draft plans contribution to the overall national target, therefore indication that the draft wind energy strategy fulfils the specific planning policy requirement set out at 4(2) of the Interim Guidelines. ▪ States that all measures contained in the draft plan have been subject to assessment under the SEA and Habitats Directives and that this was specifically mandated of the executive by the elected members in relation to 'OPTION 3 Revised' referenced above, and showing that the draft wind energy strategy fulfils the specific planning policy requirement set out at 4(3) of the Interim Guidelines. 	
LR4	Cllr Ciaran Brogan	<ol style="list-style-type: none"> 1. Submission outlines items insofar as they improve infrastructure to facilitate further growth in the Letterkenny Municipal District as follows: <ul style="list-style-type: none"> ▪ Roads and traffic management must be a priority for the county and it is important to continue to prioritise the road network in Letterkenny and the county. ▪ Letterkenny relief road currently included as TEN-T with Letterkenny to Lifford Relief road and B/S bypass. ▪ Leck road realignment and improvement works ▪ Sallaghrairie realignment and improvement works ▪ Put in place a route selection for the mountaintop to Windyhill/Killylastin road, to provide for growth in the area and alleviate traffic congestion in this area. ▪ Must continue to improve linkages within and throughout Letterkenny, and continue to improve pedestrian linkages throughout these areas. 	<ol style="list-style-type: none"> 1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report. In addition, the particular items in relation to Letterkenny will be reviewed and addressed as part of the LAP for Letterkenny. 2. Refer to themed response on core strategy and housing contained in section 3.1 of this report. 3. Refer to themed response on natural and built heritage and the environment contained in section 3.6 of this report and also to

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
		<p>2. In relation to housing and development of towns, outlines the following matters:</p> <ul style="list-style-type: none"> ▪ Continue to build new houses to meet the demand of the housing list and introduce regeneration programmes where the council would buy properties to help build communities again. ▪ Need Irish water to commit to improving investment in smaller towns and villages to facilitate local development. ▪ Need for supported housing in Letterkenny for people with special needs or otherwise to allow them to live independently with supporting services. <p>3. In relation to tourism, outlines the following matters:</p> <ul style="list-style-type: none"> ▪ County continue to develop tourism and time is right for a tourism flagship project; the council has an opportunity to do this on council owned lands in Letterkenny, such as a fun park development similar to Tayto park to enhance the success of the WAW by joint venture or seeking an expression of interest from specialists in this area. There are many themes that could be accommodated for the NW and potentially cross border. ▪ Opportunity to develop/enhance the area at Port Bridge, possibly a weir towards the development of a walk along the Swilly towards Oldtown. ▪ Good progress has been made in walking trails working with Coillte, OPW and other sporting and community groups and has become a huge part of tourism. <p>4. In relation to infrastructure, outlines the following matters:</p> <ul style="list-style-type: none"> ▪ States that the council have no input to the role of IW, and that being able to connect to a public sewer is a basic human right as we approach 2020. There are many areas without proper water and sewer infrastructure particularly some small towns and villages. ▪ The council must continue to address the take-over of estates in the Plan to address concerns at temporary treatment plants being put in place. 	<p>themed response on tourism contained in section 3.8.</p> <p>4. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p>
lr5	Cllr Seamus O'Domhaill	<p>1. Submission requests that Portnablagh be added to the list of settlements within the tiered towns; it is a major tourist village and not being designated as a town could restrict its potential growth and development. Every effort should be made to allow towns along the WAW to realise their full potential in attracting inward investment.</p>	<p>1. Refer to themed response on core strategy and housing contained in section 3.1 of this report.</p>
LR6	Cllr Seamus O'Domhaill	<p>1. Submission proposes to change policy wording of T-P-4 in Draft Plan in its entirety so that it reads as below: 'T-P-4, It is the policy of the Council not to permit developments requiring new accesses onto National Roads where the speed limit is greater than 60kph. Where there is an existing safe entrance it will be permitted that an individual who can substantiate that they already reside on the road may be accommodated with a new or replacement dwelling as this does not equate to intensification of existing access points.'</p>	<p>1. Refer to themed response on Infrastructure (roads, water, wastewater) contained in section 3.3 of this report.</p>
LR7	Cllr Seamus O'Domhaill	<p>1. Submission requests that the following new policy be included in Chapter 9, Tourism of the Draft Plan: 'It is the policy of the Council to support the development of a Coastal Greenway from Falcarragh (An Fál Carragh) along the coast to Bunbeg (An Bun Beag) whilst creating various access points to settlements along the route. The route is proposed to be a cycle and walking route which would allow</p>	<p>1. Refer to themed response on tourism contained in section 3.8 of this report</p>

Ref	Party/Councillor	Summary of points raised in submission	Response and Recommendations arising
LR8	Cllr Canning	<p>for the tourism potential of the North West Gaeltacht to be fully realised.'</p> <ol style="list-style-type: none"> 1. Requests clarity on Policy CS-P-5 to clarify the sequential test principles promoted in this policy would not preclude the consideration of small, neighbourhood scale facilities in non-town centre areas. 	<ol style="list-style-type: none"> 1. Refer to themed response on core strategy and housing contained in section 3.1 of this report.

**Appendix B to the Chief Executive's
Report on submissions received in
respect of the Draft County Donegal
Development Plan 2018-2024**

**Mapping
(and other associated
documentation related to Material
Alteration)**

October 2017



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

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1 List of mapping and documents

This appendix contains the following:

- Section 2:** Documentation associated with non-material alteration arising from the themed response on Infrastructure.
- Section 3:** Mapping associated with Material Alterations 2 and 10.
- Section 4:** Mapping of the site specific submissions.
- Section 5:** AO map of the site specific submissions relating to wind energy (large folded map).
- Section 6:** AO map of the site specific submissions relating to Letterkenny (large folded map).

2 Documentation associated with non-material alteration arising from the themed response on Infrastructure

The following non-material amendment arises out of the themed response on infrastructure (section 3.3 of the main body of the Chief Executive's Report refers).

The recommendation in section 3.3.6 is as follows:

To amend Table 2.4 (Chapter 2 of Draft CDP) to reflect updated information provided by Irish Water in respect of water and wastewater capacity in Layer 2B settlements. New table 2.4 to read as follows:

Table 2.4: Strategic Status of Water Services across Layers 1 and 2A

Town	Water	Wastewater
Layer 1		
Letterkenny	Capacity is available. Letterkenny Water Supply Scheme including a new Water Treatment Plant at Goldrum is a Major Programmes Project included on the Irish Water Investment Plan 2017-2021 comprising circa €22million investment. Target completion in 2018.	Capacity & treatment available.
Layer 2A		
An Clochán Liath (Dungloe)	Capacity issues to be resolved during PRW1 (2017-2021) assisted by replacement of approximately 9.7km of pipework as part of the Countywide Water Main Rehabilitation Project and intensification of find & fix activities to reduce existing leakage levels.	Capacity issues to be imminently resolved through the Glenties/ Dungloe Sewerage Schemes WWTP's. Capacity & treatment will be available once the WWTP is commissioned.
Ballybofey- Stranorlar	Capacity & quality available	Capacity issues to be resolved through the Ballybofey-Stranorlar Wastewater Network and WWTP projects as included on the Irish Water Investment Plan 2017-2021. Consultants engaged end of 2016 to design WWTP to appropriate population equivalent.
Ballyshannon	Capacity issues to be addressed through Ballyshannon Regional Water Supply Scheme as included on the Irish Water Investment Plan 2017-2021 comprising €15 million investment.	Capacity & treatment available
Buncrana	Capacity & quality available	Capacity & treatment available Design proposals for upgrading Westbrook Pumping Station are being considered. Improvements to commence regarding operation and storm water handling capacity at Westbrook pumping station by 2018 under the County Donegal Towns and Villages Project.
Bundoran	Capacity & quality to be improved through Ballyshannon Regional Water Supply Scheme as included on the Irish Water Investment Plan 2017-2021 comprising €15 million investment together with interconnecting network to be progressed as part of the Countywide Water Main Rehabilitation Project.	Capacity issues to be resolved imminently through the Donegal Group B Sewerage Scheme as included on the Irish Water Investment Plan 2017-2021. WWTP and network improvements are currently under construction. Capacity is available once the WWTP is commissioned.
Carndonagh	Capacity & quality available. Irish water Investment Plan 2017-2021 provides for decommissioning of Carndonagh WTP Carndonagh and revised supply from Pollam Dam.	Capacity & treatment available
Donegal Town	Capacity & quality available	Capacity & treatment available

Town	Water	Wastewater
Killybegs	Water processing capacity to be increased through Killybegs Regional Water Supply Scheme as included on the Irish Water Investment Plan 2017-2021 comprising €9 million investment.	Capacity issues to be resolved imminently through the Donegal Group B Sewerage Scheme as included on the Irish Water Investment Plan 2017-2021. Capacity & treatment will be available once the WWTP is commissioned.
Layer 2B		
Ailt an Chorráin (Burtonport)	Supply is via Rosses Regional WSS. Improvements to Crollly Water Treatment Plant and works to identify additional water resources will be undertaken over the next investment period. Additional works include the replacement of pipework within the Rosses Regional WSS network as part of the Countywide Water Main Rehabilitation Project and intensification of find & fix activities to reduce existing leakage levels.	No – identified as an urban area where improvements are required to resolve priority issues. Current collection system has a connected PE of approx. 69. Included on EPA's list of sites with no wastewater treatment. Project underway to provide a new WWTP.
An Bun Beg-Doirí Beaga (Bunbeg-Derrybeg)	Supply is via Rosses Regional WSS. Improvements to Crollly Water Treatment Plant and works to identify additional water resources will be undertaken over the next investment period. Additional works include the replacement of defective pipework (high burst frequency) within the Rosses Regional WSS network as part of the Countywide Water Main Rehabilitation Project and intensification of find & fix activities to reduce existing leakage levels.	No IW sewage collection or treatment in place. Majority of houses served by septic tanks. Irish Water are working to deliver an innovative project to provide a sewerage collection and treatment facility for this area. An initial demonstration project involving 20-30 houses is being prepared.
An Charraig (Carrick)	At present, water treatment capacity & water availability are adequate. A new treatment plant is to be constructed at Owenteskna.	No IW sewage collection or treatment in place.
An Fál Carrach (Falcarragh)	A major upgrade of the Ardsbeg Water Treatment Plant is nearing completion. This will ensure there is adequate treatment capacity and water availability.	New WWTP being provided by IW (1,675p.e.)
Ardara	At present, water treatment capacity & water availability are adequate. Upgrades proposed to the Glenties and Ardara WTP.	Yes – Urban area pe=1920; WWTP pe=2350
Ballyliffen	At present, water treatment capacity & water availability are adequate.	No – Urban area pe=1303; WWTP pe=400. Feasibility study for the upgrade of Ballyliffin WWTP due to commence in 2017.
Bridgend	At present, water treatment capacity & water availability are adequate.	No – Urban area pe=763; WWTP pe=652. Feasibility study for the upgrade of Bridgend WWTP due to commence in 2017.
Dunfanaghy (and Portnablagh)	A new Water Treatment Plant at Creeslough is anticipated to be complete in 2019. This will ensure adequate water treatment capacity & water availability.	No – Urban area pe=2376; WWTP pe=900. Feasibility study for the upgrade of Dunfanaghy (and Portnablagh) WWTP due to commence in 2017.
Glenties	At present, water treatment capacity & water availability are adequate. Upgrades proposed to the Glenties and Ardara WTP.	New WWTP in place with 1,600p.e. capacity
Greencastle	Inishowen Regional Water Supply Scheme upgrade in progress. The scheme will provide a link from Illies WTP to Inishowen East which will facilitate the decommissioning of Greencastle WTP. This will ensure there is adequate water treatment capacity & water availability.	Project underway to provide a new WWTP ultimately serving Moville and Greencastle.
Lifford	At present, water treatment capacity & water availability are adequate.	No – Urban area pe=2182; WWTP pe=1550. This WWTP is currently not included on the IW Investment Plan for

Town	Water	Wastewater
		upgrade.
Malin	At present, water treatment capacity & water availability are adequate.	Yes - Served by plant that also serves Carndonagh. Urban area pe=5424; WWTP pe=5833
Moville	At present, water treatment capacity & water availability are adequate.	Included on EPA's list of sites with no wastewater treatment. Project underway to provide a new WWTP ultimately serving Moville and Greencastle.
Ramelton	Ramelton is currently connected to Milford PWS. This scheme to be interconnected with the new Goldrum WTP (Letterkenny WSS). This will ensure adequate water treatment capacity & water availability.	Included on EPA's list of sites with no wastewater treatment. Project underway to provide a common WWTP serving Rathmullan, Ramelton and Milford.
Raphoe	At present, water treatment capacity & water availability are adequate. Lough Mourne WSS is included in the upcoming Countywide Mains Rehabilitation Project, which includes the replacement of problematic water mains (poor water quality & high bursts) on this scheme.	No – Urban area pe=1686; WWTP pe=800. New WWTP being provided by IW (2,500p.e.)

3 Mapping associated with Material Alterations 2 and 10.

There are 2 material alterations set out in section 4 of the main body of the Chief Executive's Report that relate to mapping amendments. The relevant maps are set out on the following pages and comprise the following:

Material Alteration 2:

To amend table 2.3, section 2.3.3, chapter , page 16 so as to insert Portnablagh as a named town within 'Layer 3 Rural Towns and open Countryside' and therefore in addition to:

- (i) Amend Table 15.2 of Part C, page 93 so as to insert Portnablagh as Map 15.60 and;
- (ii) Insert an additional Settlement Framework map for Portnablagh as shown on the map contained in Appendix B of this report into the Layer 3 Settlement Framework maps contained in Part C.

Material Alteration 10:

It is recommended that a minor adjustment to the settlement framework boundary of Convoy is made to include a parcel of land as shown on the Map contained in Appendix B of this report.



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12(4) of the Planning
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Submission Nos
Refer
P61 & LR 5

Issue
Identification as a Settlement
in Core Strategy.

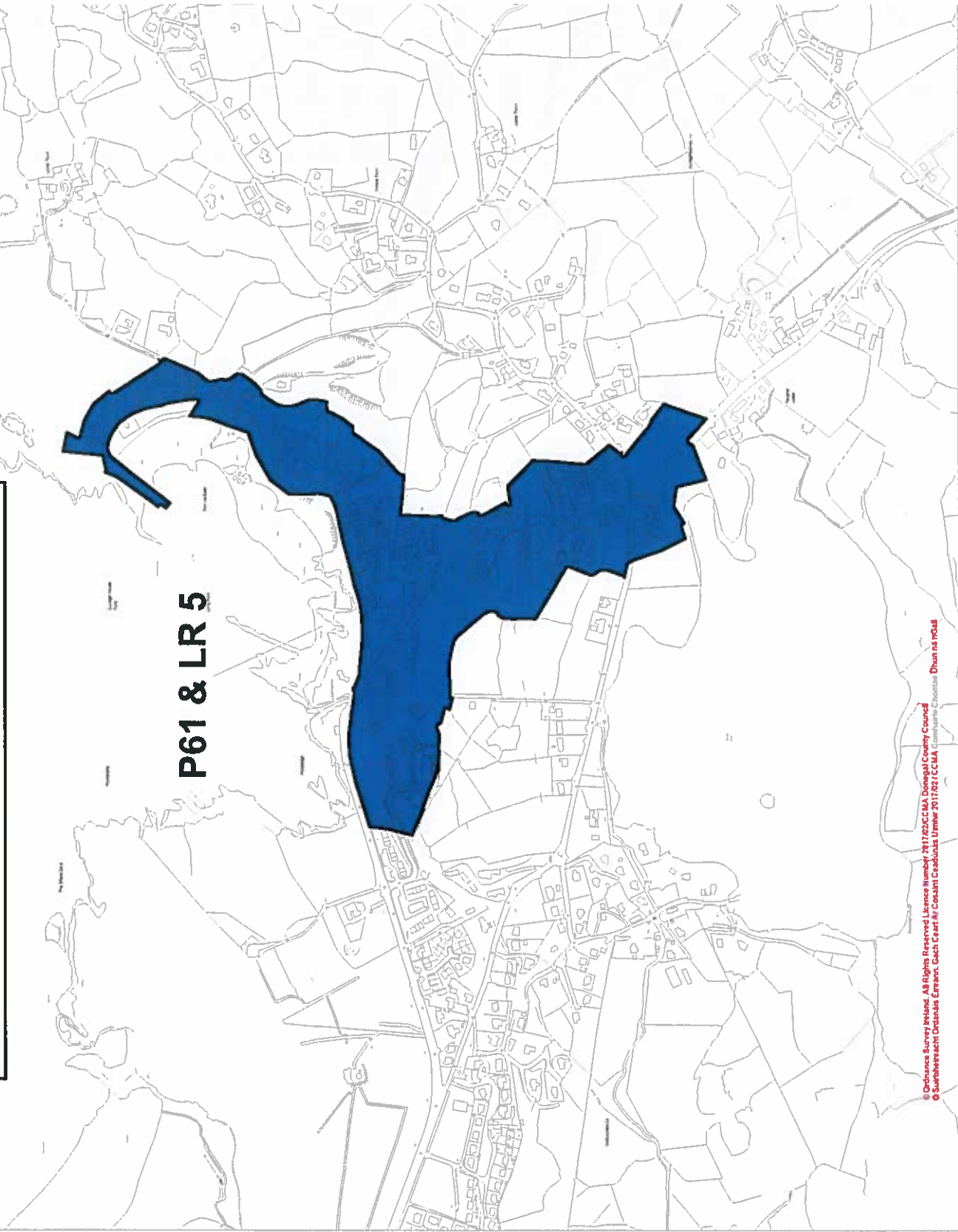
Legend

Submissions On
CDDP 2018 2024



Appendix B: Mapping Associated with Material Alteration 2 (CE Report Section 4 refers)

P61 & LR 5





P75

Convoy

**Appendix B: Mapping Associated
with Material Alteration 10
(CE Report Section 4 Refers)**

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Map No

**Public Submission No
Refers)
P75**

**Issue
Inclusion of lands within the
settlement boundary.**

Legend

**Submissions On
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4 Mapping of the site specific submissions

A large number of submissions related to site specific locations and the following pages map the relevant lands. Lands have only been mapped where either a map accompanied the submission or where the submission clearly identified a folio number or planning application reference number. The themed response on site specific submissions contained in section 3.12 of the main body of the Chief Executive's Report sets out the detailed consideration of each site specific submission.

The maps are sequenced in the following order and relate to the following submission numbers:

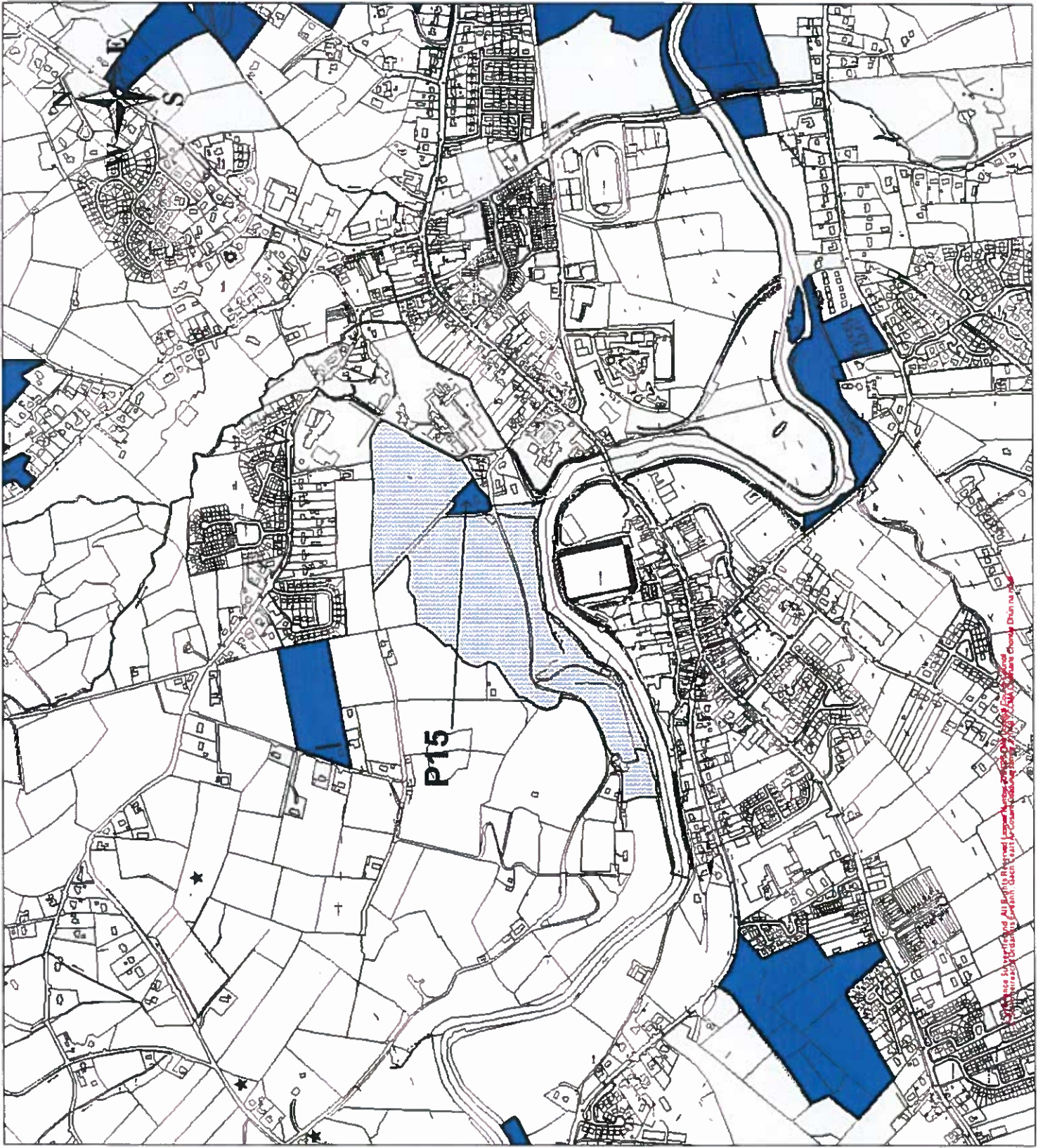
Layer 2 locations	Submissions
Ballybofey-Stranorlar	P15, P25, P40,P54,P62, P63, P73, P101, P172, P177, P197(A)-(B), P76, P176(A-N), P232, P270
Buncrana	P07, P14, P20, P34, P77, P85, P155, P228, P284
Bundoran	P111
Carndonagh	P29, P35, P39(A-E), P157, P194, P246
Donegal Town	P27, P109
Killybegs	P105, P273
Dunfanaghy	P189(A-E), P259
Glenties	P17
Moville	P78(A-C), P79, P116, P236
Ramelton	P152

Layer 3 locations	Submissions
Bunbeg-Derrybeg	P106
Convoy	P75
Killygordon	P195
Loughanure	P231
Manorcunningham	P57, P208
Milford	P242(A-B), P244
Mountcharles	P156
Muff	P233
Rural area at: <ul style="list-style-type: none"> ▪ Illistrin ▪ Burt ▪ Roshine ▪ Rossnowlagh ▪ Redcastle ▪ Drung ▪ Magherabeg 	P205, P66, P266, P74, P193, P206, P212, P248

4.1 Mapping of submissions in relation to Ballybofey-Stranorlar

The following submissions are mapped in relation to specific sites located in Ballybofey-Stranorlar:

Town	Submissions
Ballybofey-Stranorlar	P15, P25, P40,P54,P62, P73, P101, P172, P177, P197(A), P197(B), P76, P176(A-N), P232, P270



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12(4) of the Planning
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Map No

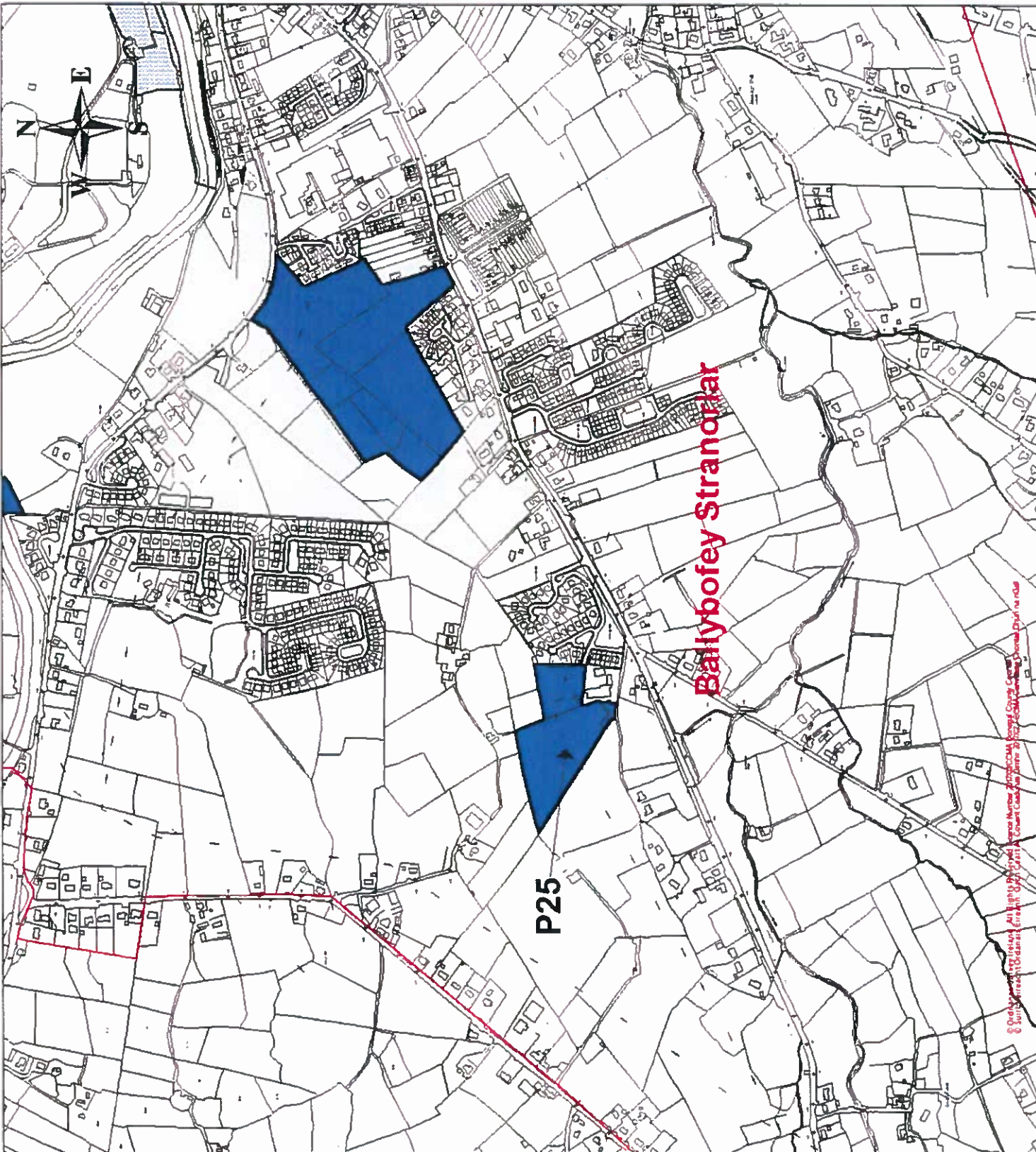
**Public Submission No
(Refers)
P15**

**Issue
Removal of 'Amenity' zoning
from a small area on the edge
of Drumboe Woods.**

Legend

**Submissions On
CDDP 2018 2024**





P25

Ballybofey Stranorlar

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12(4) of the Planning
& Development Acts,
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Map No

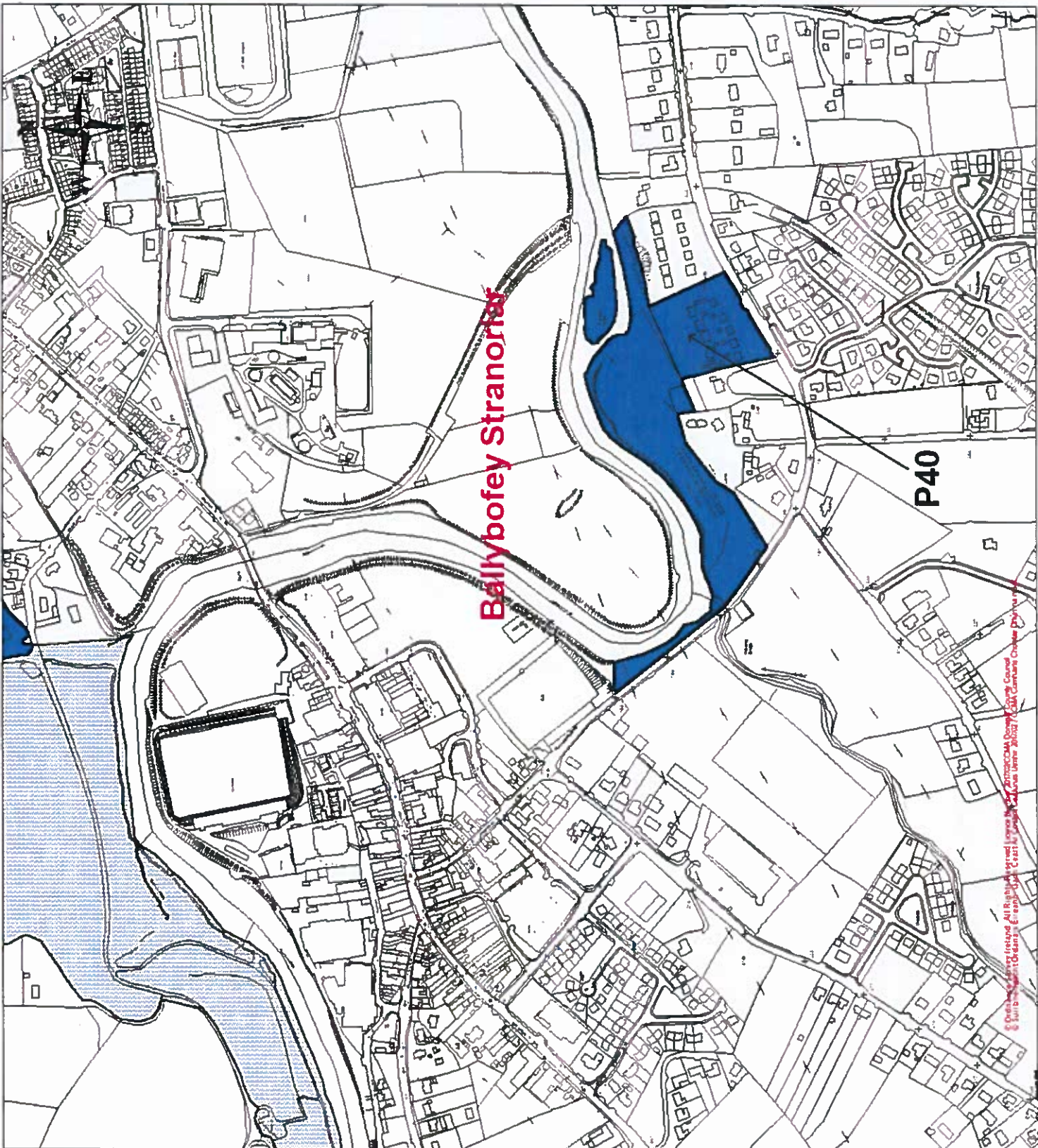
Public Submission No
Refers)
P25

Issue
Rezoning of white land within
the designated settlement
boundary to 'Residential'.

Legend

Submissions On
CDDP 2018 2024





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12(4) of the Planning
& Development Acts,
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Map No

**Public Submission No
(Refers)
P40**

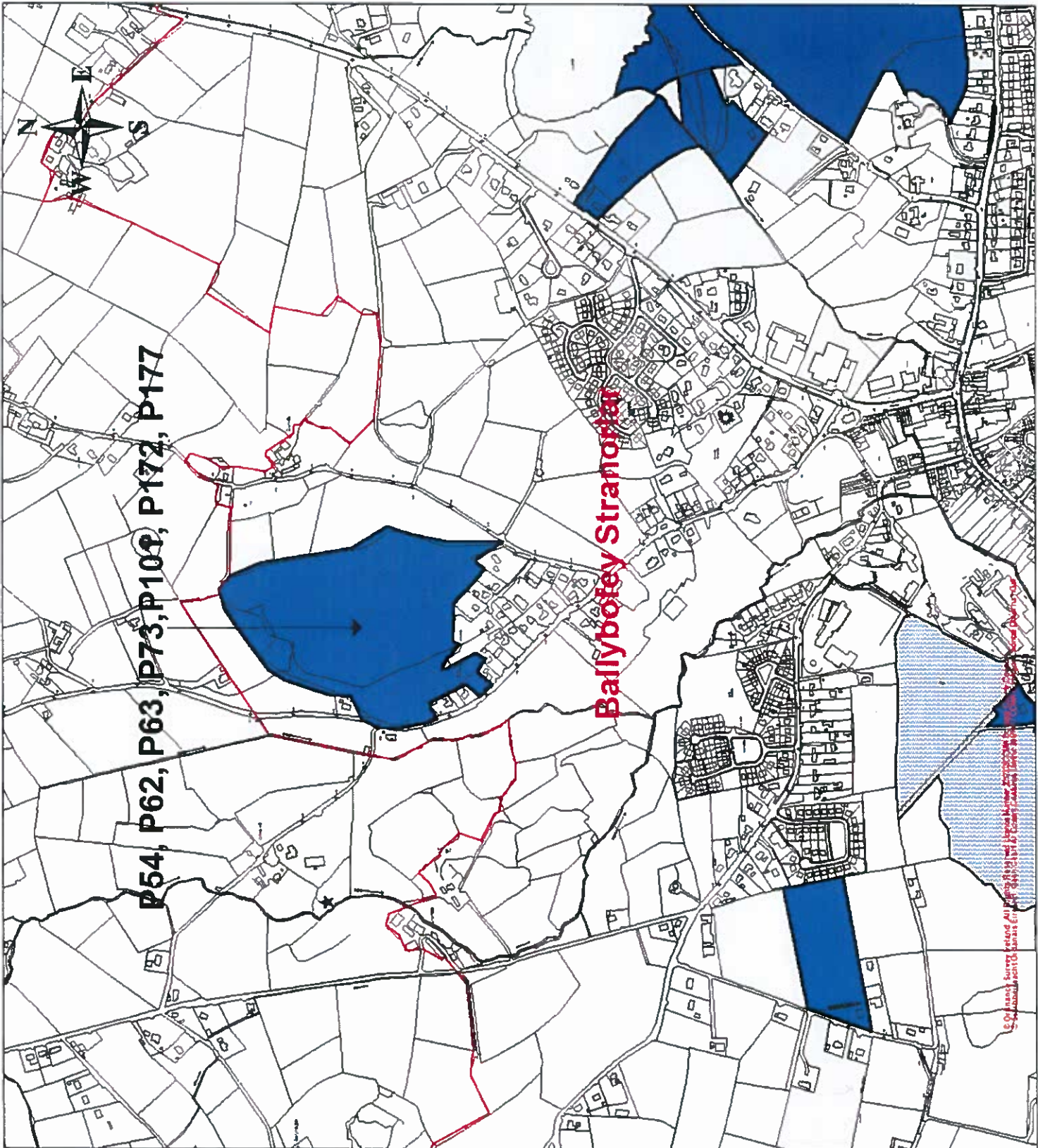
**Issue
Rezoning of white land within the
designated settlement boundary
to 'Residential'.**


Legend

**Submissions On
CDDP 2018 2024**



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Map No

Public Submission No
Refers)
P54, 62, 63, 73, 172, 177

Issue
Preservation of Dunwiley Wood
as an 'Amenity Area'

Legend

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12(4) of the Planning
& Development Acts,
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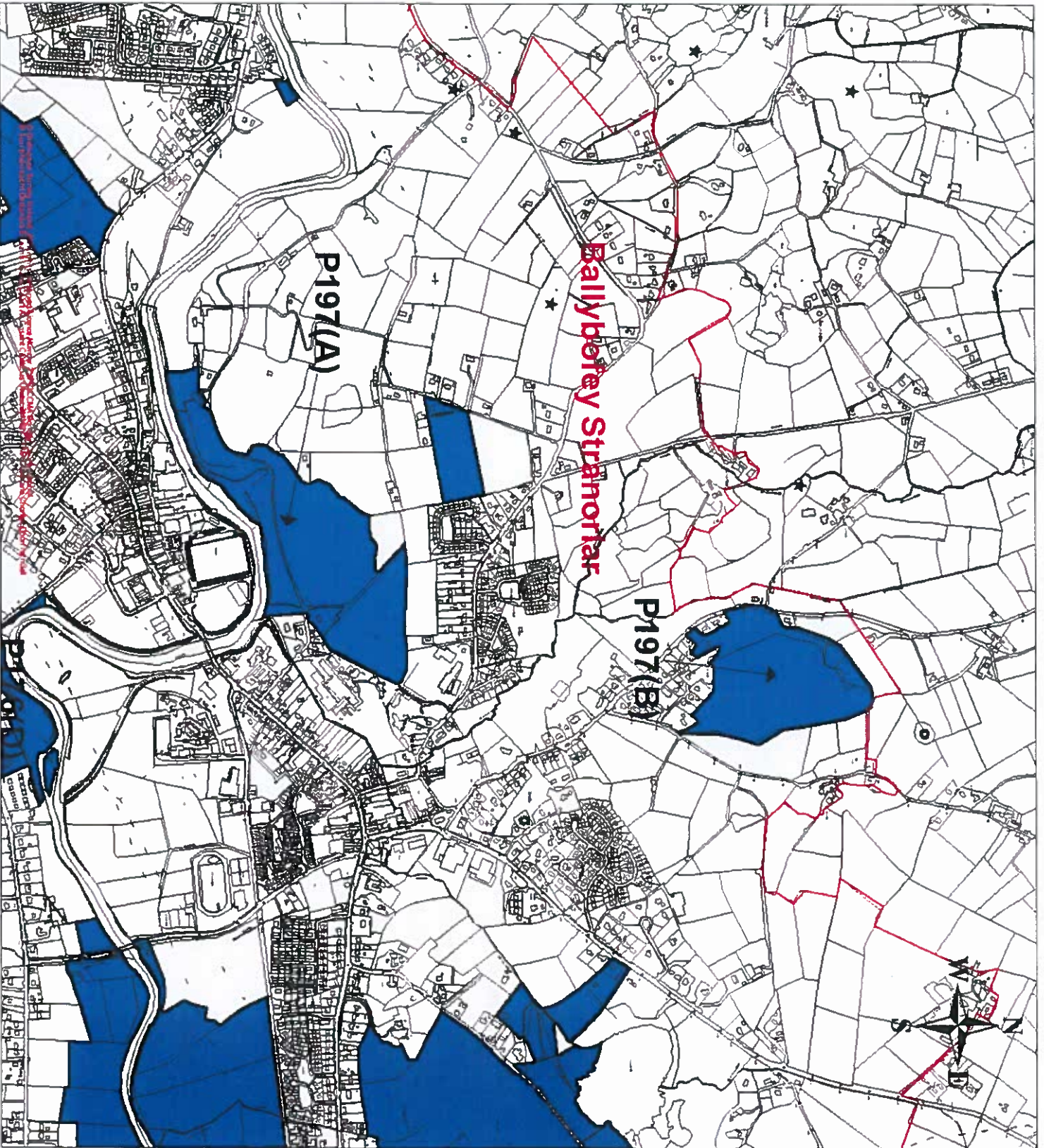
Map No

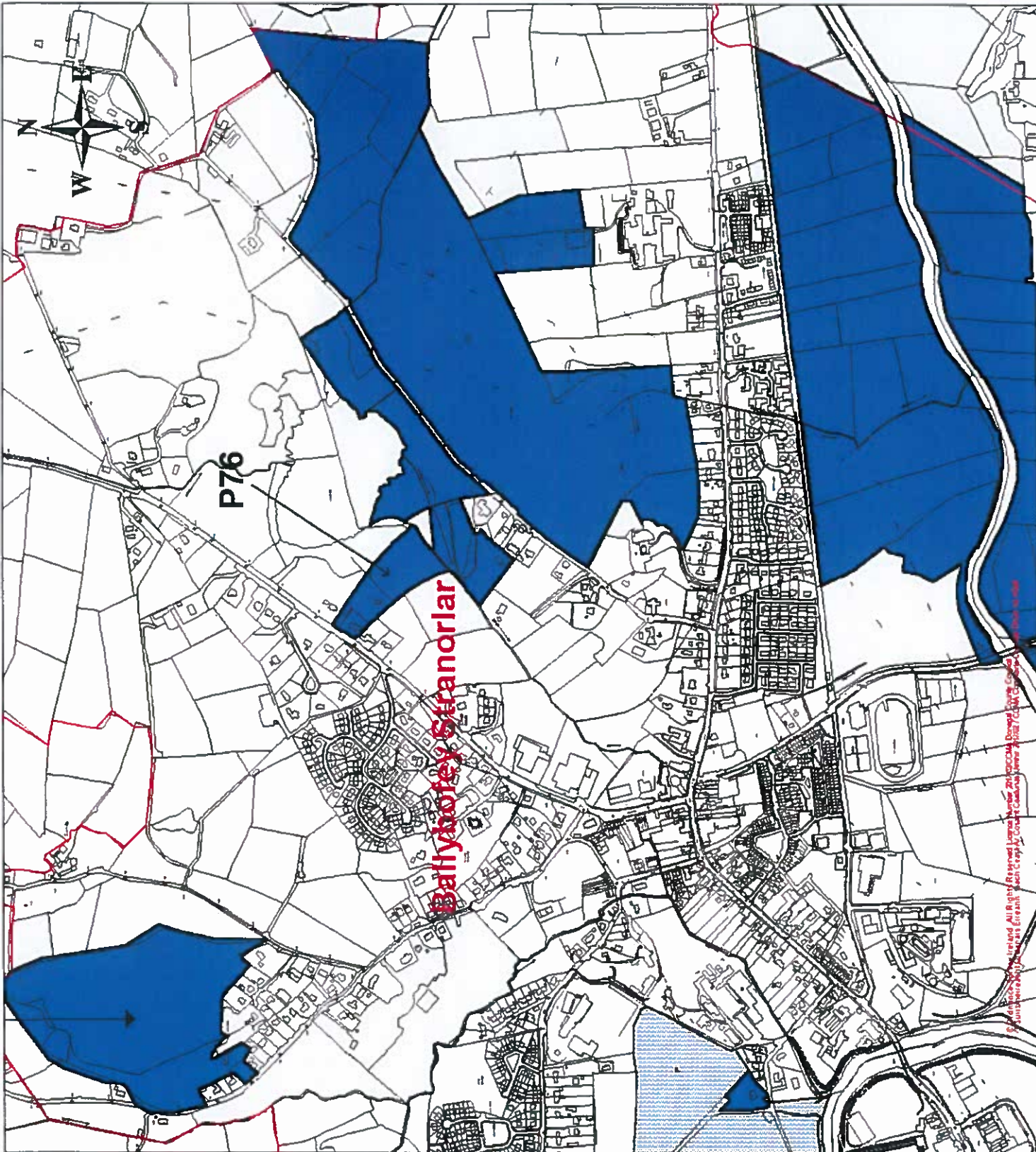
Public Submission No
Refers)
P1979A-B)

Issue
Preservation of Dunwiley
Wood as an 'Amenity Area'


Legend

Submissions On
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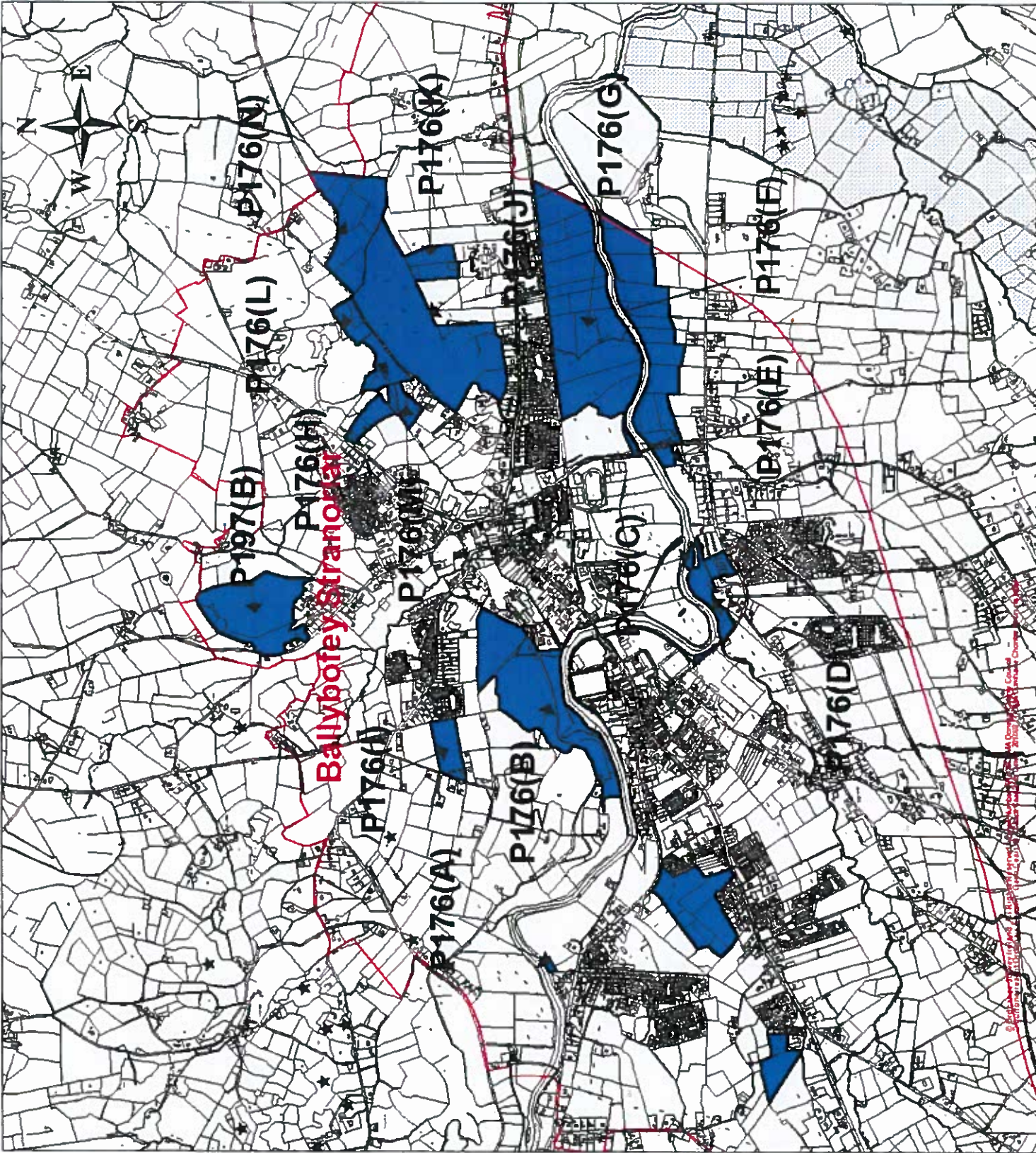
2018 - 2024
 (As required by Section
 12(4) of the Planning
 & Development Acts,
 2000 - 2017)


Map No
 Public Submission No
 Refers)
 P76

Issue
 Rezoning of white land within the
 designated settlement boundary
 to 'Residential'.

Legend

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Comhairle Contae Dubhaigh
Dubhainn County Council


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(As required by Section 12(4) of the Planning & Development Acts, 2000 - 2017)

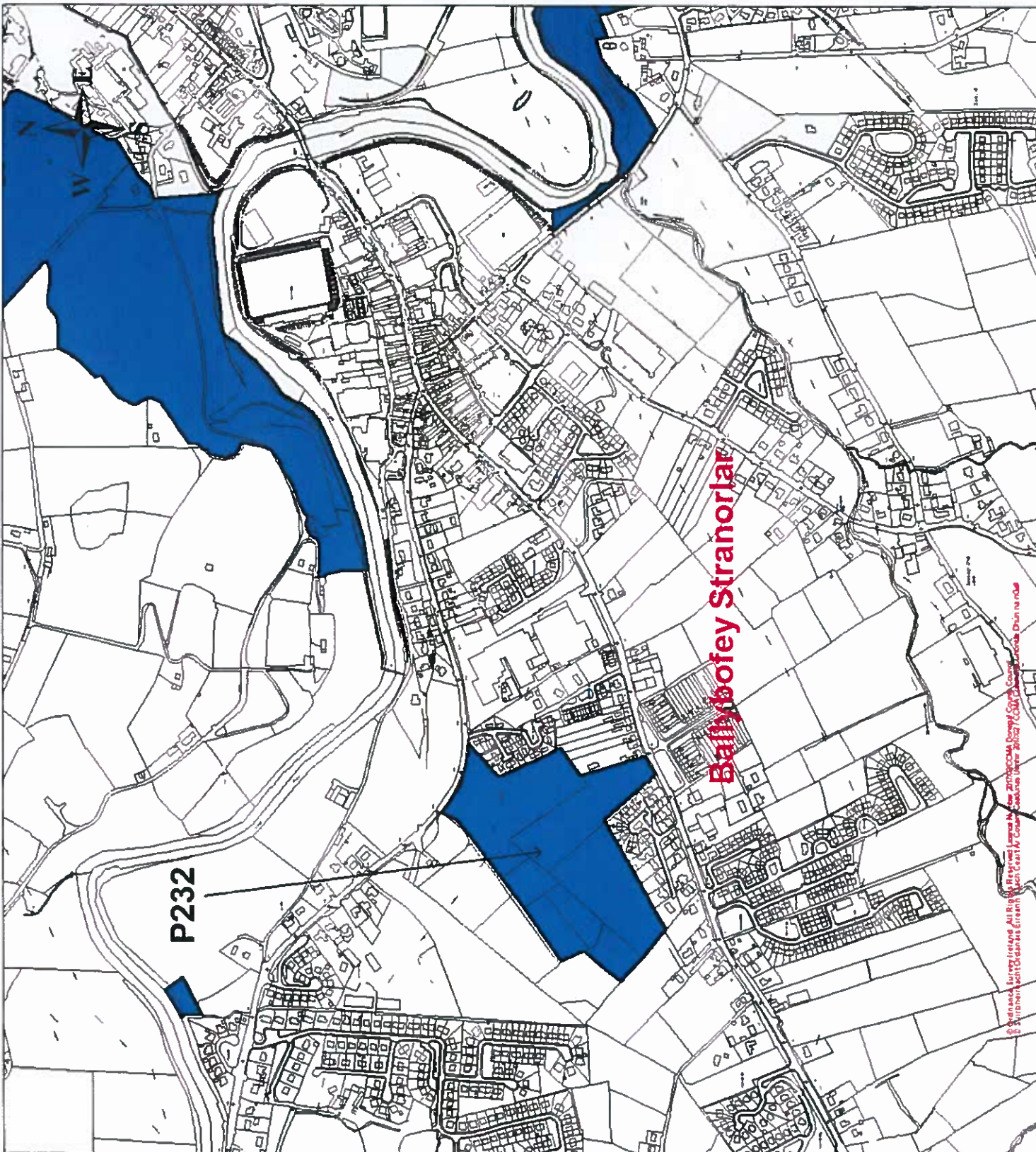
Map No
Public Submission No Refers) P176(A-N)

Issue
Removal of 'Amenity' zoning

Legend

Submissions On CDDP 2018 2024





Ballybofey Stranorlar

P232

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Map No

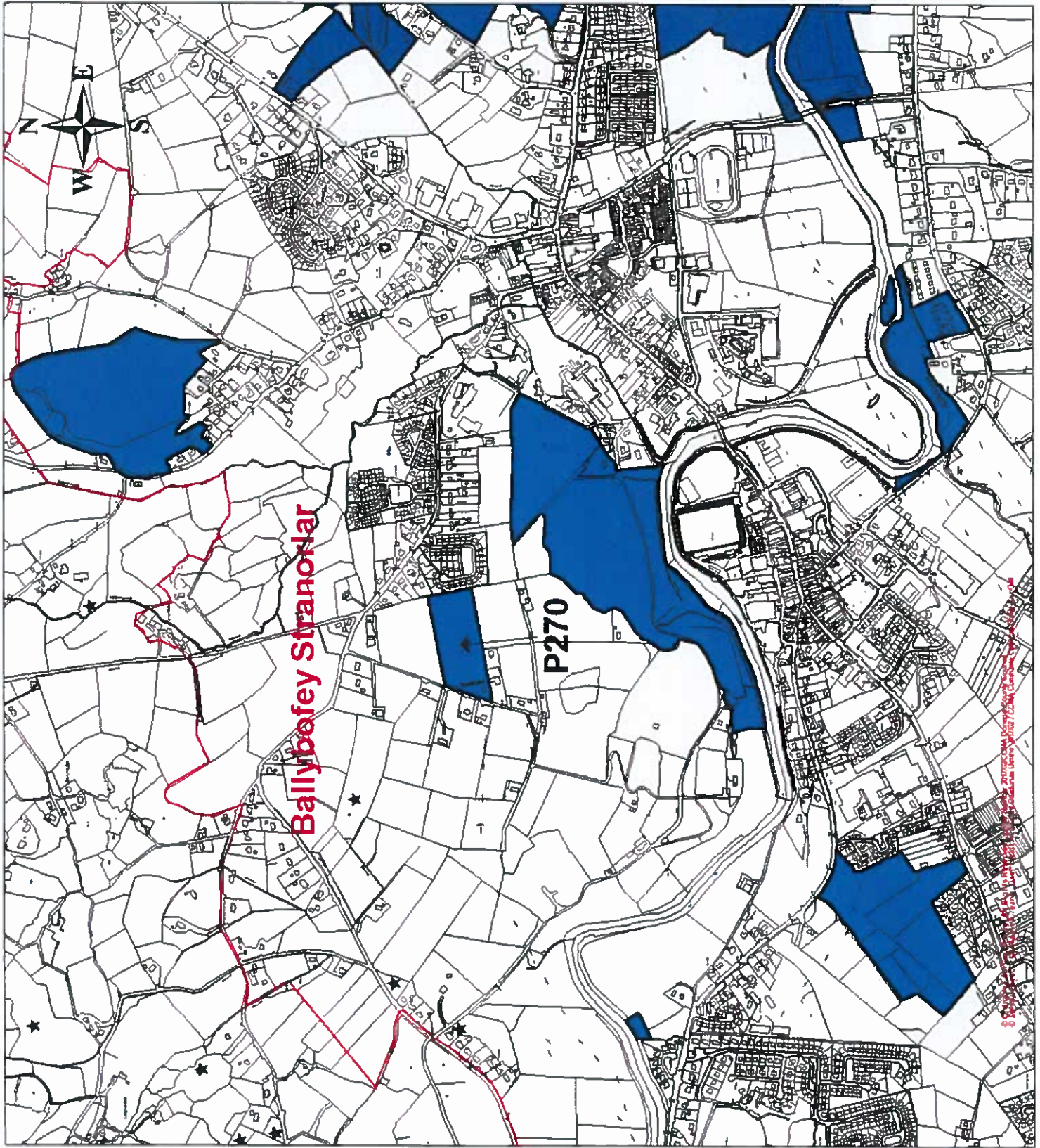
Public Submission No
Refers)
P232

Issue
Rezoning of lands for mix of
Retail, Small Manufacturing
and Storage.

Legend

Submissions On
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& Development Acts,
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Map No

**Public Submission No
Refers)
P270**

**Issue
Rezoning of 'Amenity' to '
Residential development'**

Legend

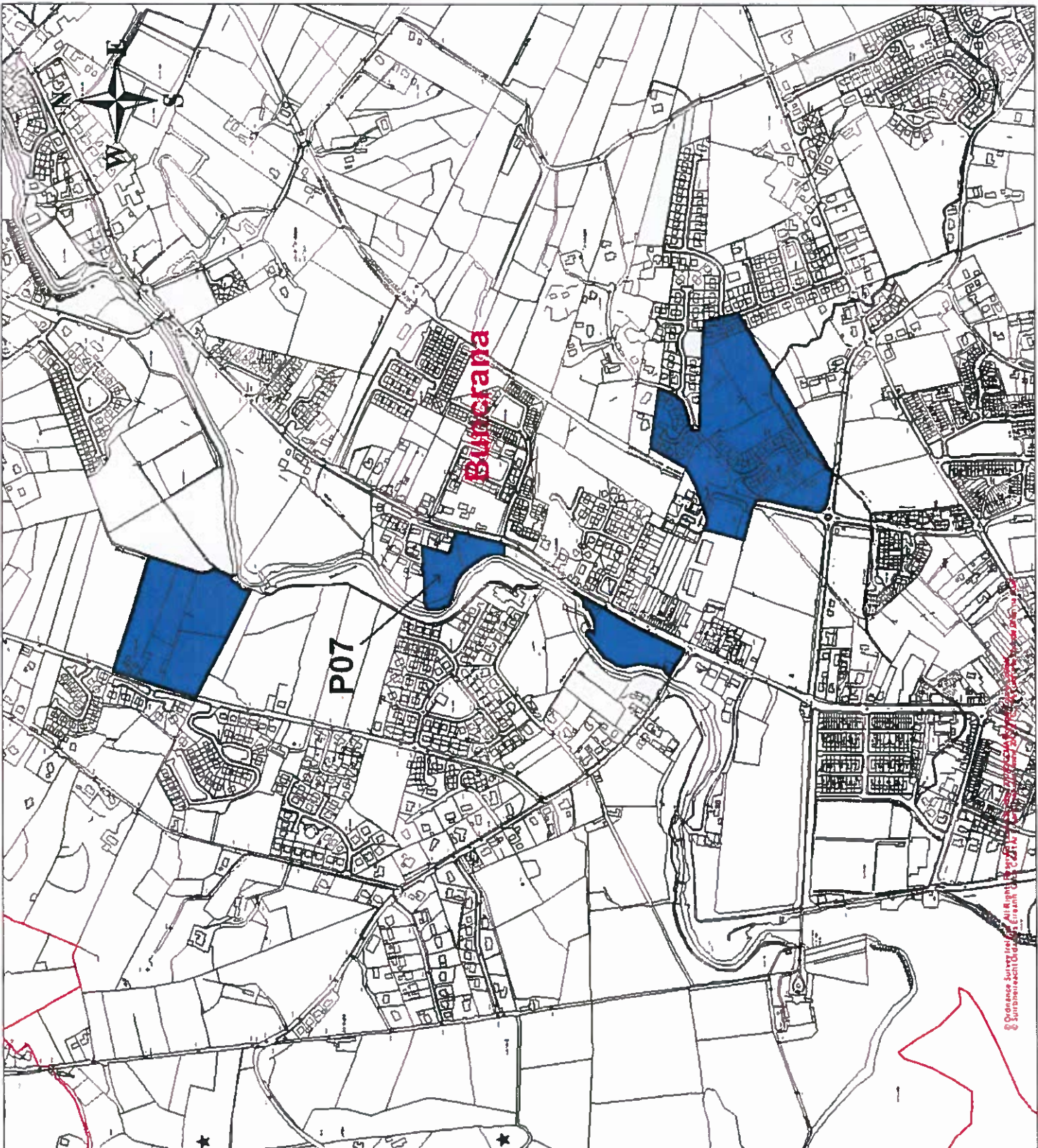
**Submissions On
CDDP 2018 2024**





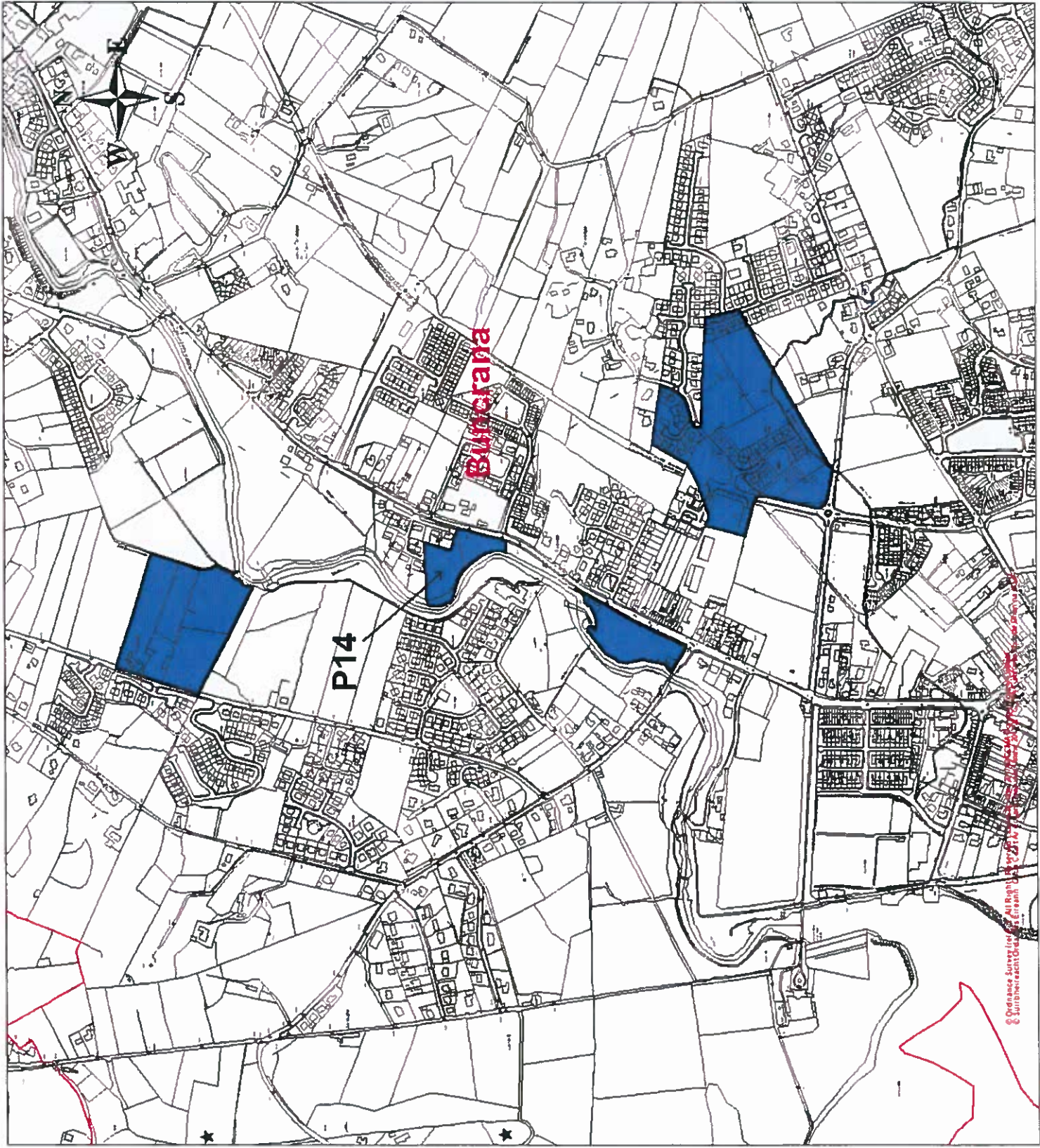
4.2 Mapping of submissions in relation to Buncrana

The following submissions are mapped in relation to specific sites located in Buncrana:

Town	Submissions
Buncrana	P07, P14, P20, P34, P77, P85, P155, P228, P284



 <p>Donegal County Council Comhairle Contae Donegal</p>	<p>Chief Executive's Report Following the Period Of Public Consultation On the Draft County Development Plan,</p>	<p>2018 - 2024 (As required by Section 12(4) of the Planning & Development Acts, 2000 - 2017)</p>	<p>Map No Public Submission No Refers) P07</p>	<p>Issue Re-zoning of lands from 'Amenity/Recreation' to 'Residential'.</p>	<p>Legend</p> <p> Submissions On CDDP 2018 2024</p>
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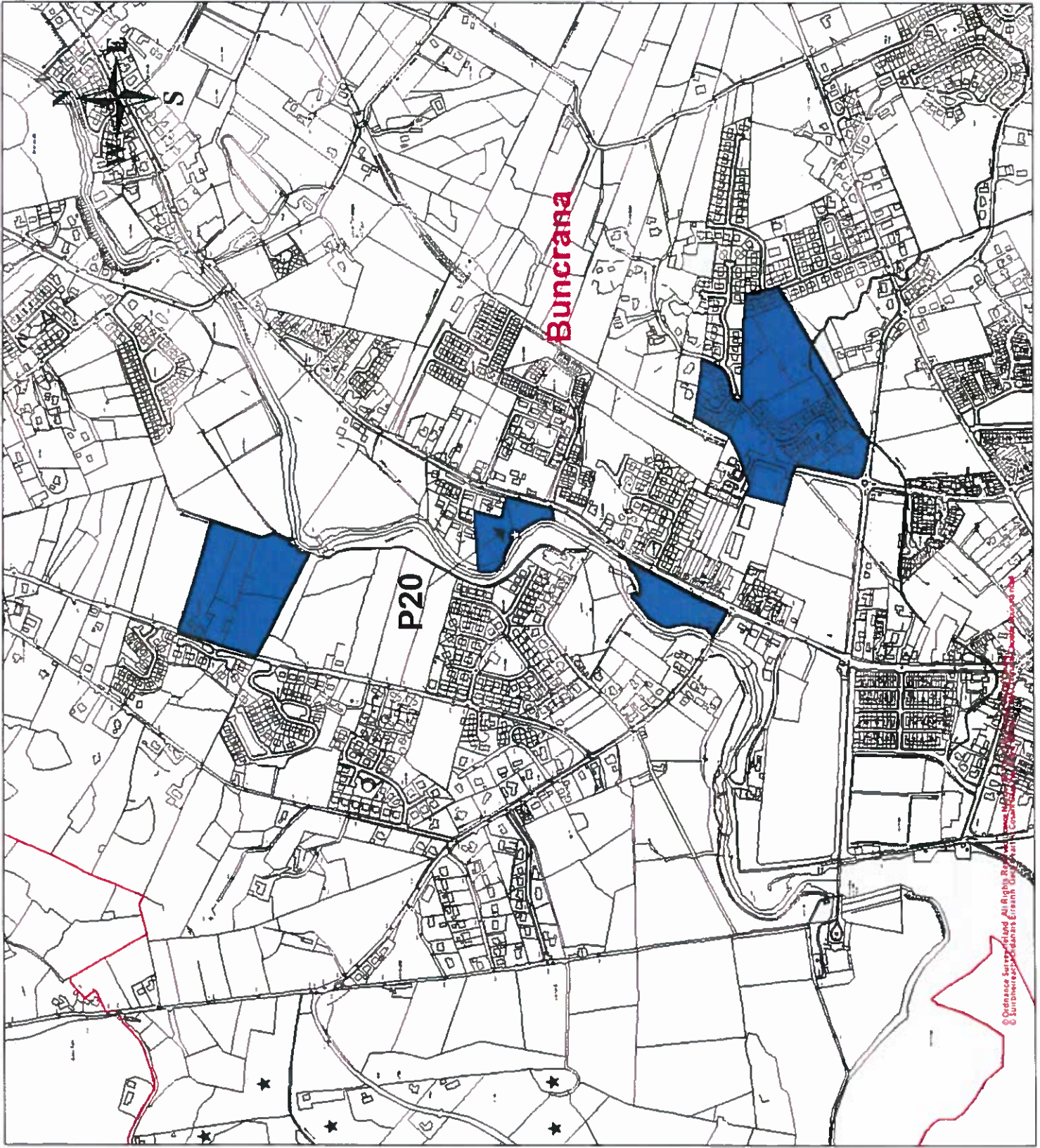
**2018 - 2024
(As required by Section
12(4) of the Planning
& Development Acts,
2000 - 2017)**

**Map No
Public Submission No
Refers)
P14**

**Issue
Re-zoning of lands from
'Amenity/Recreation' to
'Residential'.**

Legend
Submissions On
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12(4) of the Planning
& Development Acts,
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Map No

**Public Submission No
(Refers)
P20**

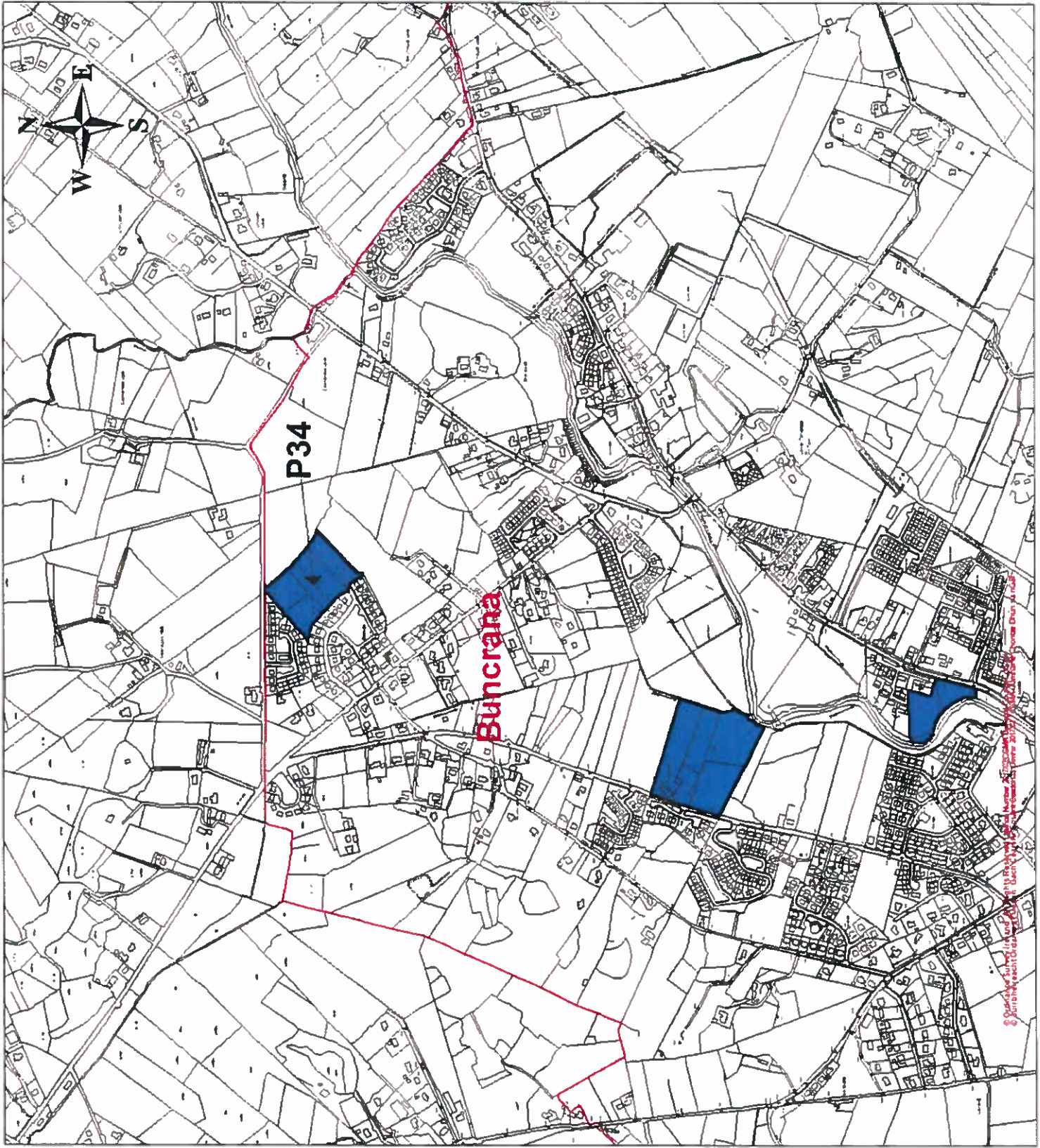
**Issue
Re-zoning of lands from
'Amenity/Recreation' to
'Residential'.**

Legend

**Submissions On
CDDP 2018 2024**



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12(4) of the Planning
& Development Acts,
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**Map No
Public Submission No
Refers)
P34**

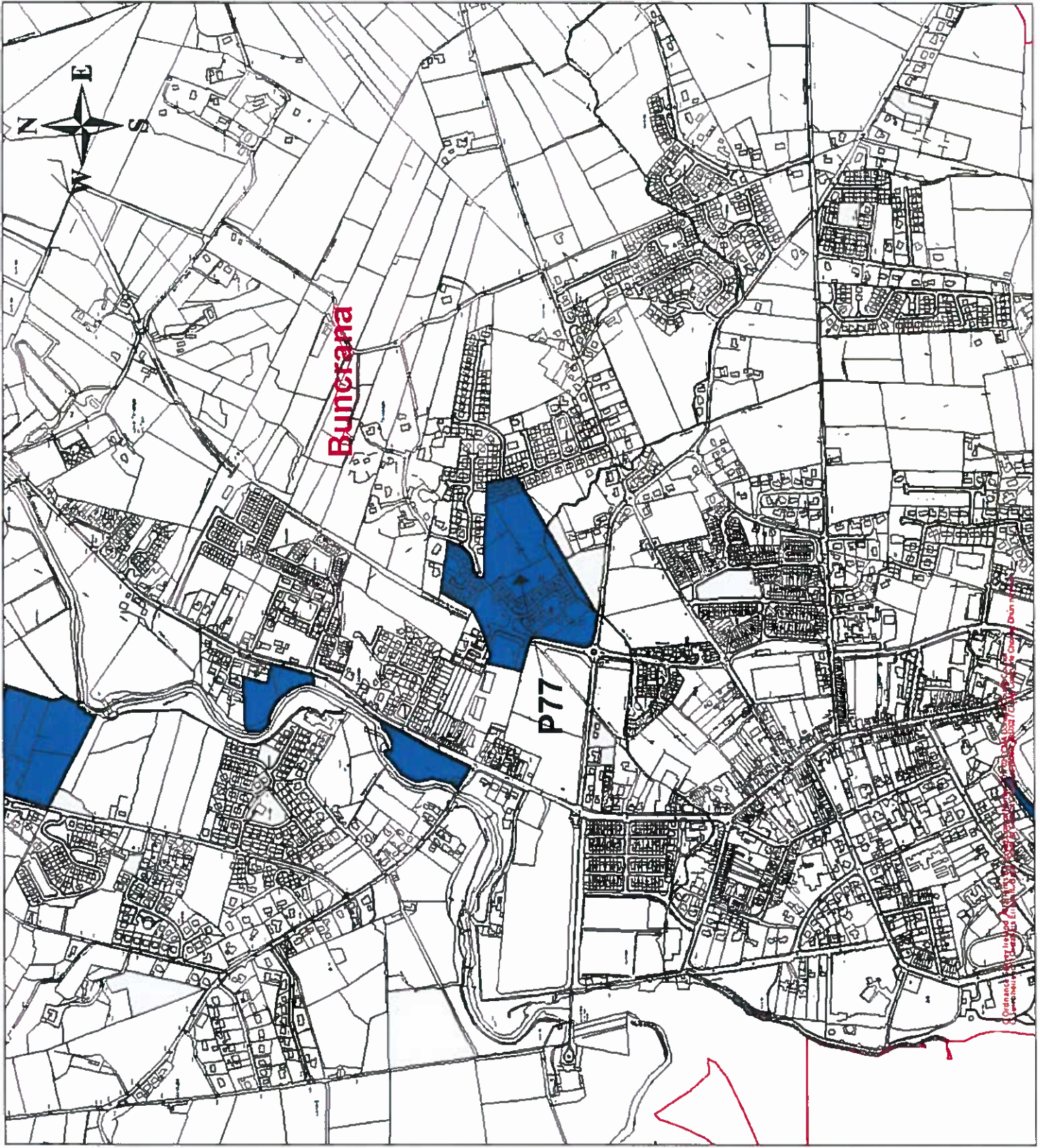
**Issue
Re-zoning from 'Strategic
Residential Reserve' to
'Residential Phase 1'**

Legend

**Submissions On
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12(4) of the Planning
& Development Acts,
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Map No

**Public Submission No
Refers)
P77**

Issue

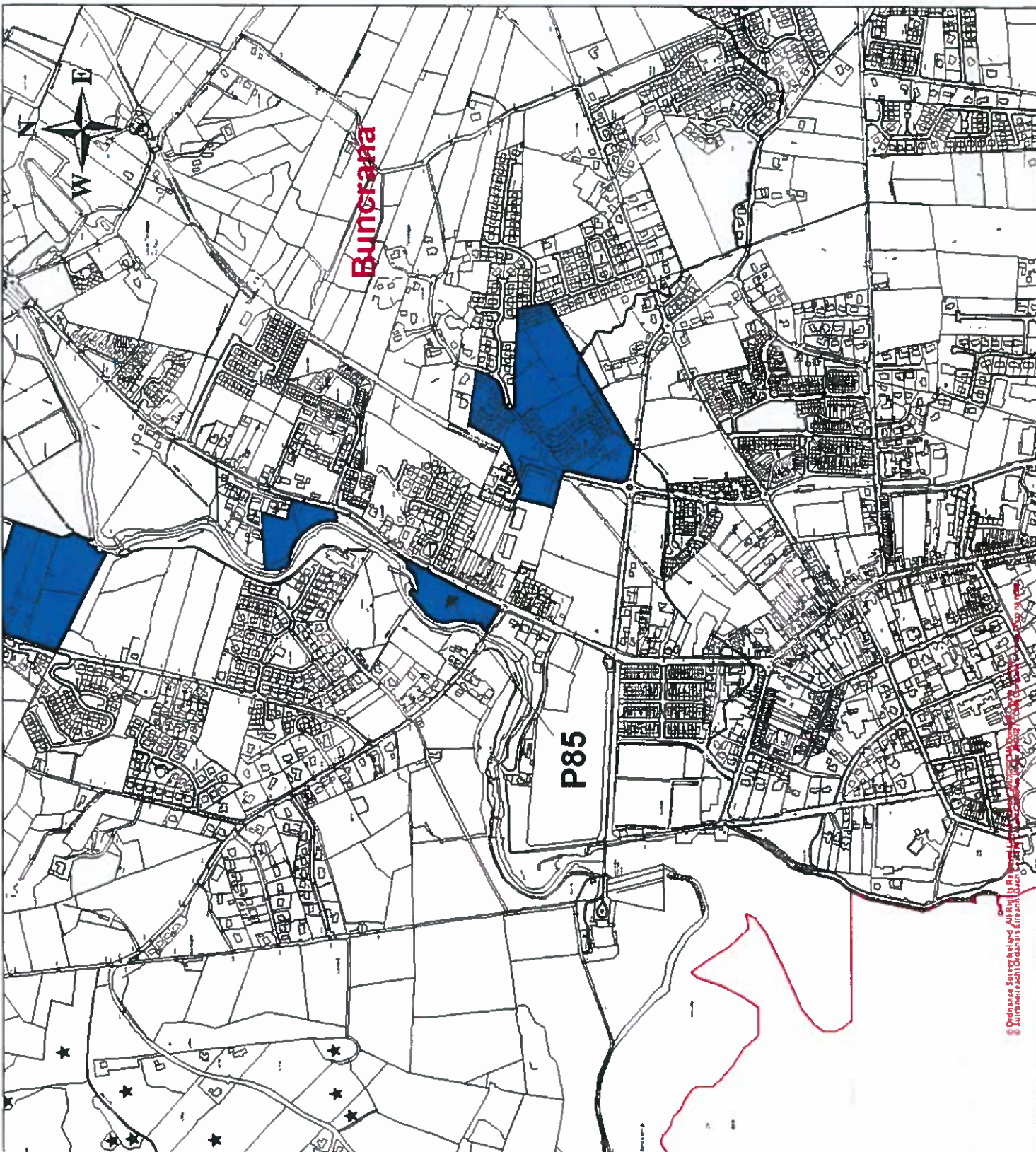
**Submission relates to rezoning of
lands from 'Strategic Residential
Reserve' to 'Primary Residential'**


Legend

**Submissions On
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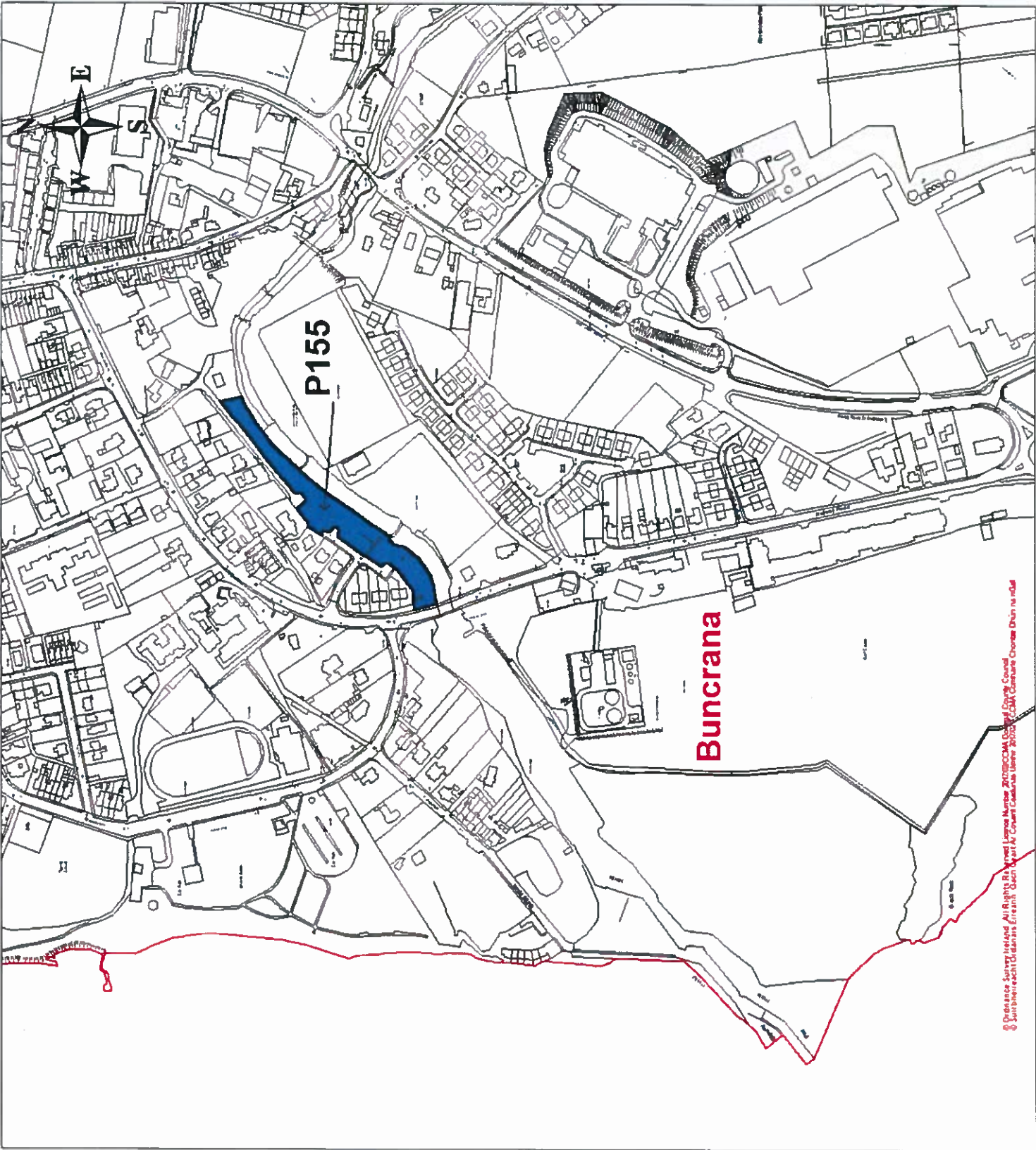

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12(4) of the Planning
& Development Acts,
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Map No
Public Submission No
Refers)
P85

Issue
Amend zoning of lands zoned
for 'infrastructure'

Legend

Submissions On
CDDP 2018 2024



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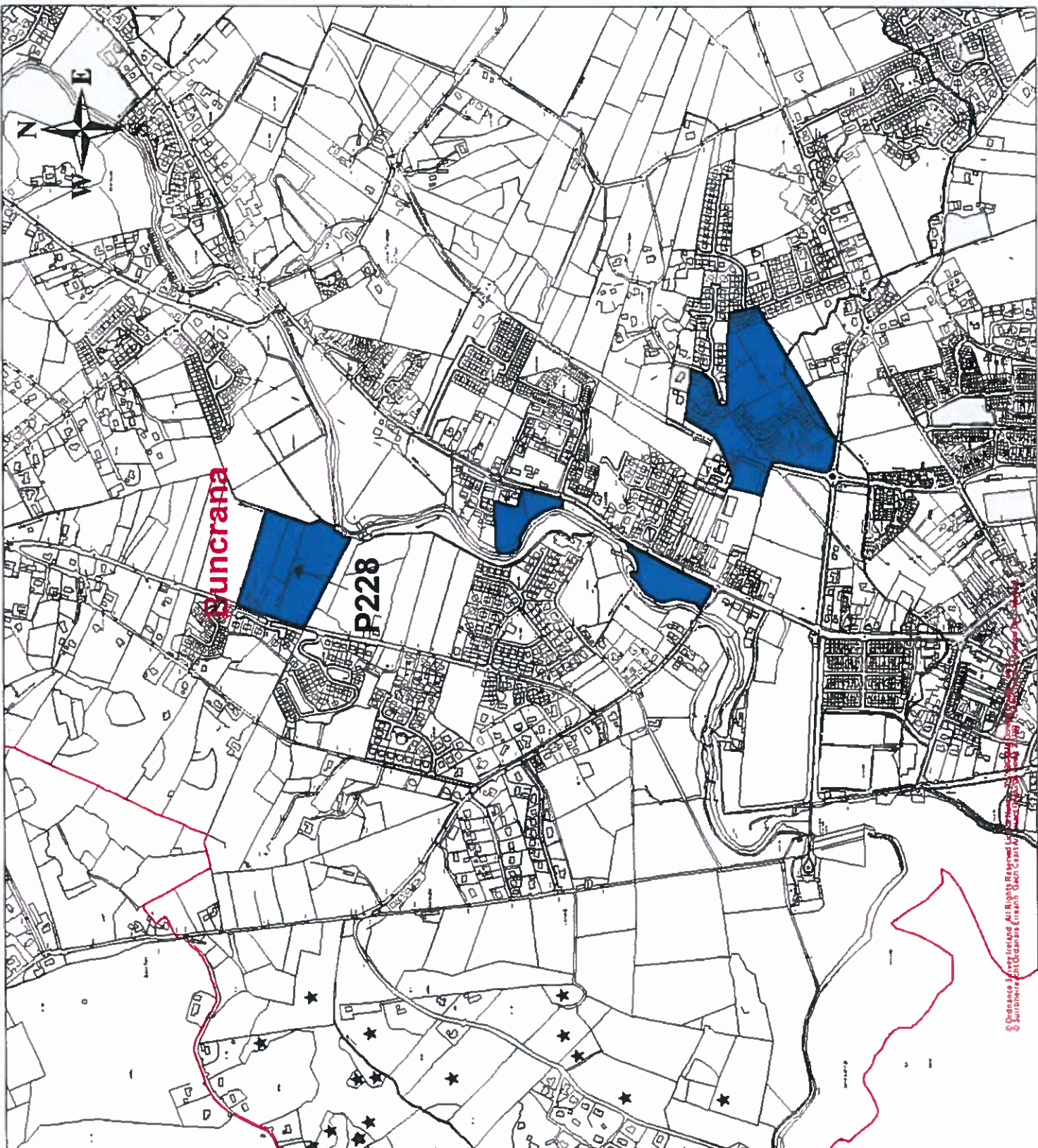
Map No
 Public Submission No
 Refers) P-155

Issue
 Retaining lands as
 'Amenity/Recreation'

Legend

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Map No

**Public Submission No
Refers)
P228**

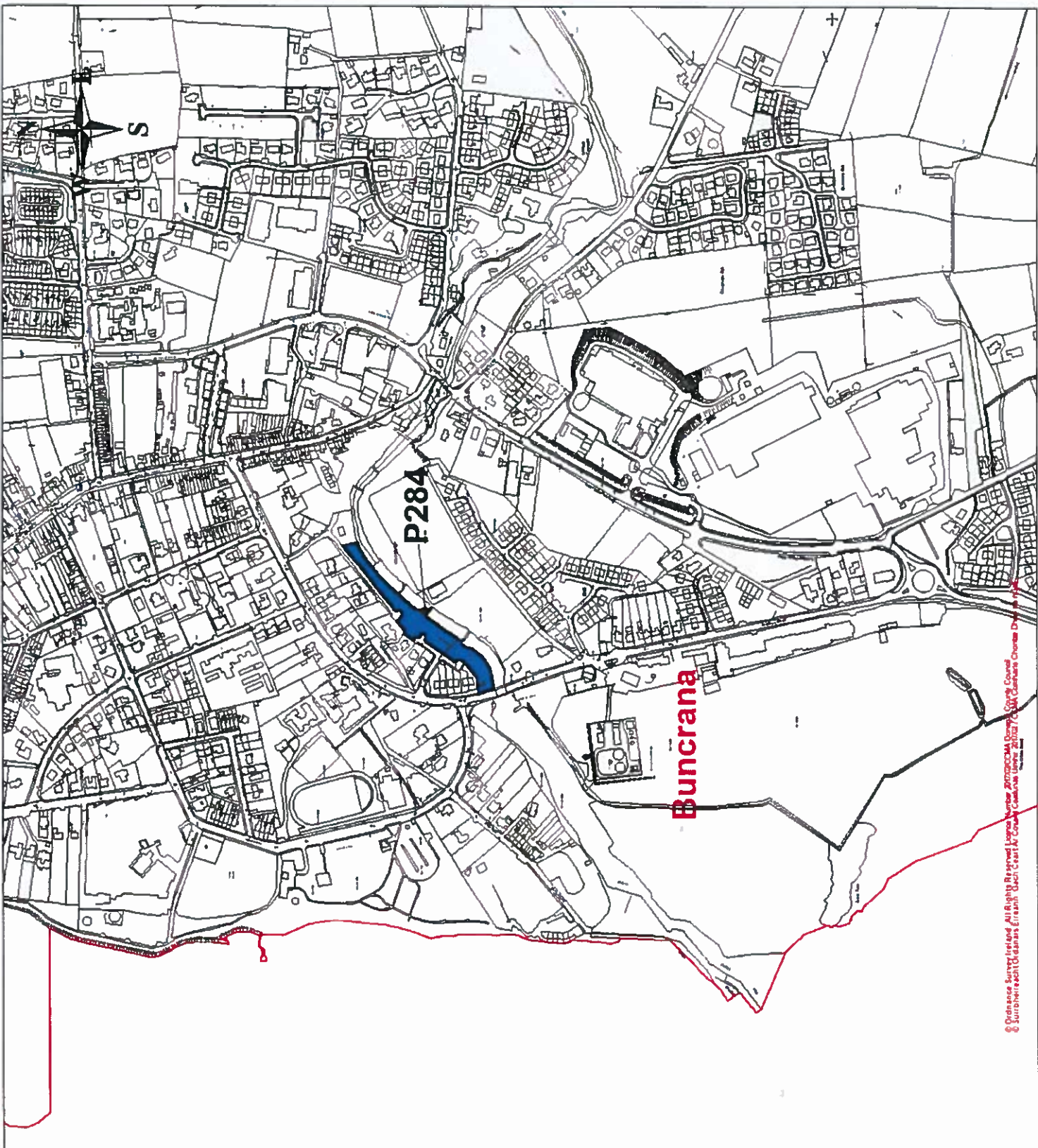
Issue

**Rezoning of lands from Agriculture
to 'Primarily Residential'**

Legend

**Submissions On
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Map No

Public Submission No
 Refers)
 P284

Issue
 Retain lands zoned as
 'amenity/recreation'

Legend

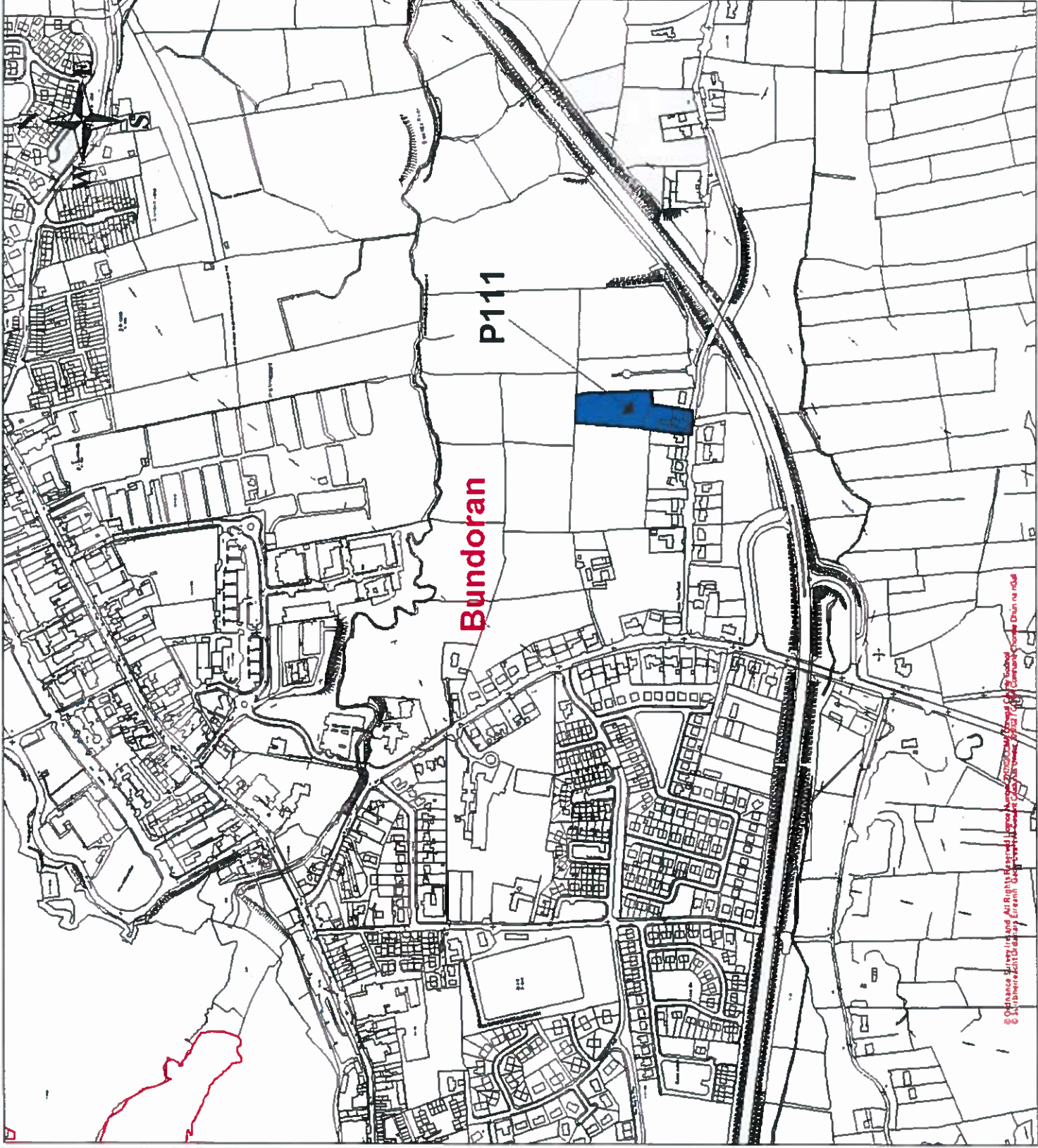
Submissions On
 CDDP 2018 2024



4.3 Mapping of submissions in relation to Bundoran

The following submission is mapped in relation to specific sites located in Bundoran:

Town	Submissions
Bundoran	P111



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Map No

**Public Submission No
Refers)
P111**

**Issue
Zoning of lands for
'Residential Phase 1'**

Legend

**Submissions On
CDDP 2018 2024**

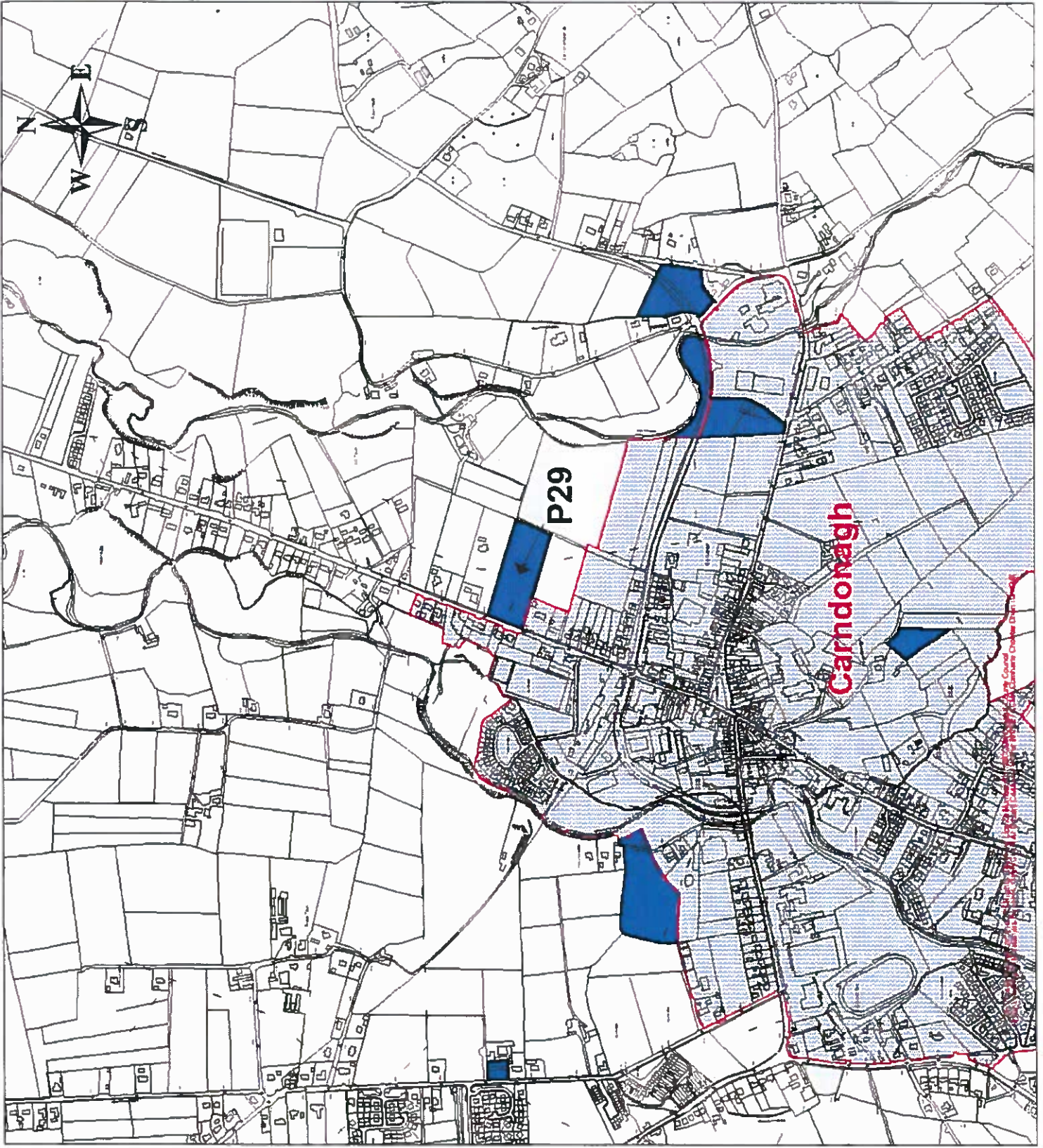



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4.4 Mapping of submissions in relation to Carndonagh

The following submissions are mapped in relation to specific sites located in Carndonagh:

Town	Submissions
Carndonagh	P29, P35, P39(A-E), P157, P194, P246





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Donegal County Council**

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Map No

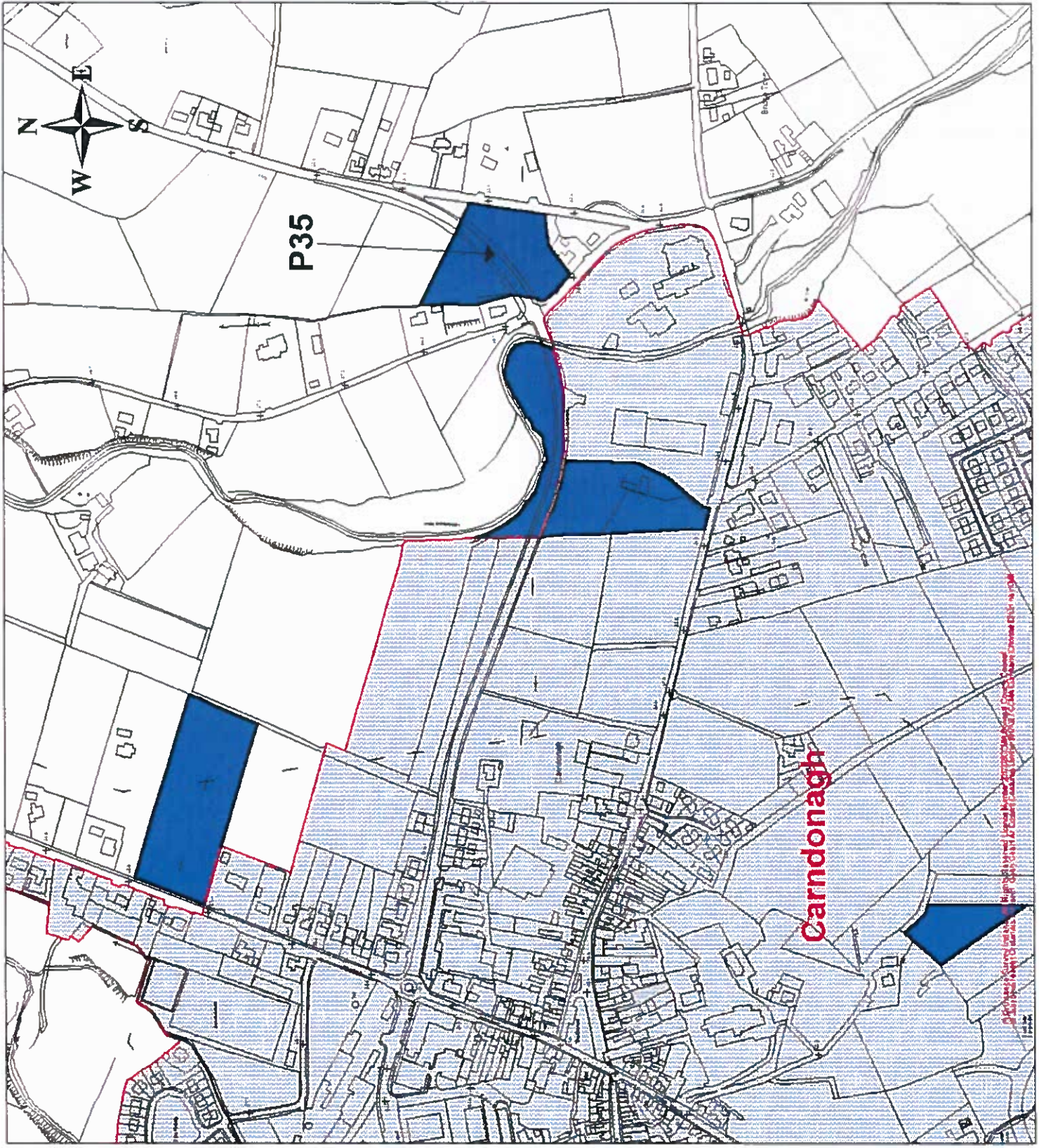
**Public Submission No
Refers)
P29**

**Issue
Inclusion of lands within
the Settlement Envelope**

Legend

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Map No

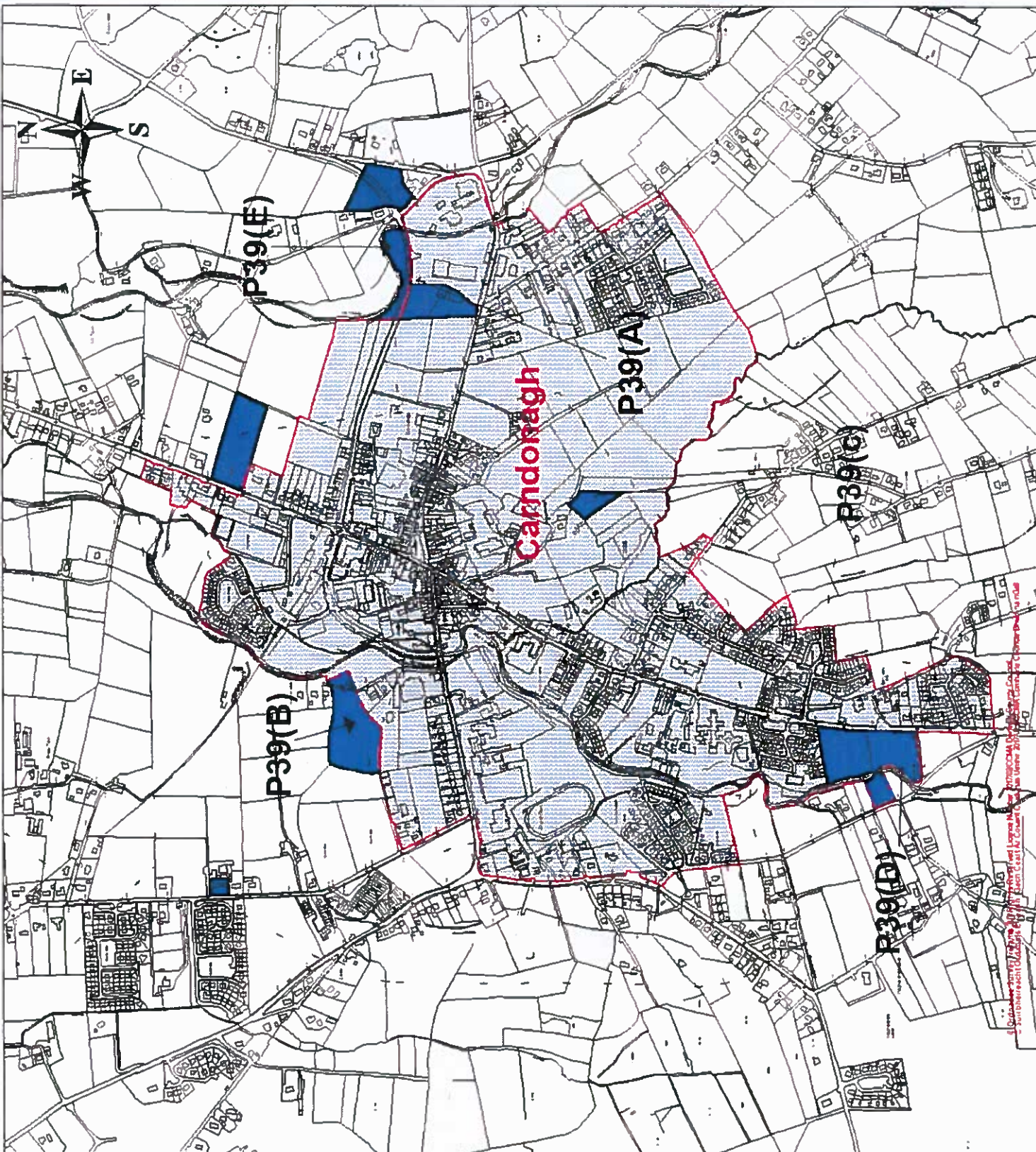
**Public Submission No
(Refers)
P35**

**Issue
Inclusion of lands within
the Settlement Envelope.**


Legend

**Submissions On
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Map No

Public Submission No
 Refers)
 P39(A-E)

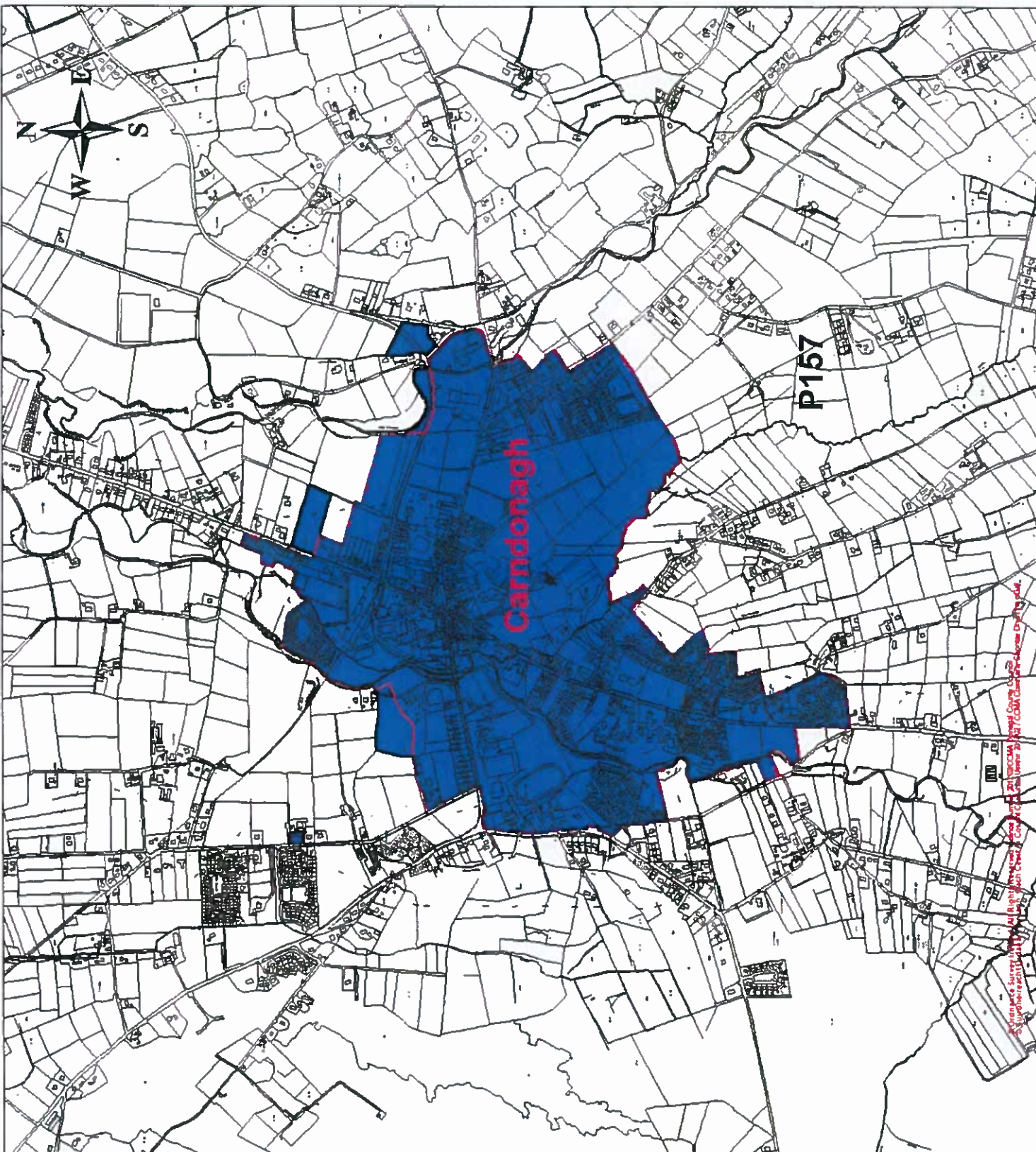
Issue

1. Identification of lands 'in-fill development'.
2. Zoning of lands for 'Residential Development'
3. Zoning of lands for 'Residential Development'
4. Zoning of lands for 'Residential'
- 4b. Zoning of field to south of girls primary school for 'Education'
5. Inclusion of lands within the Settlement Envelope

Legend

Submissions On

 CDDP 2018 2024



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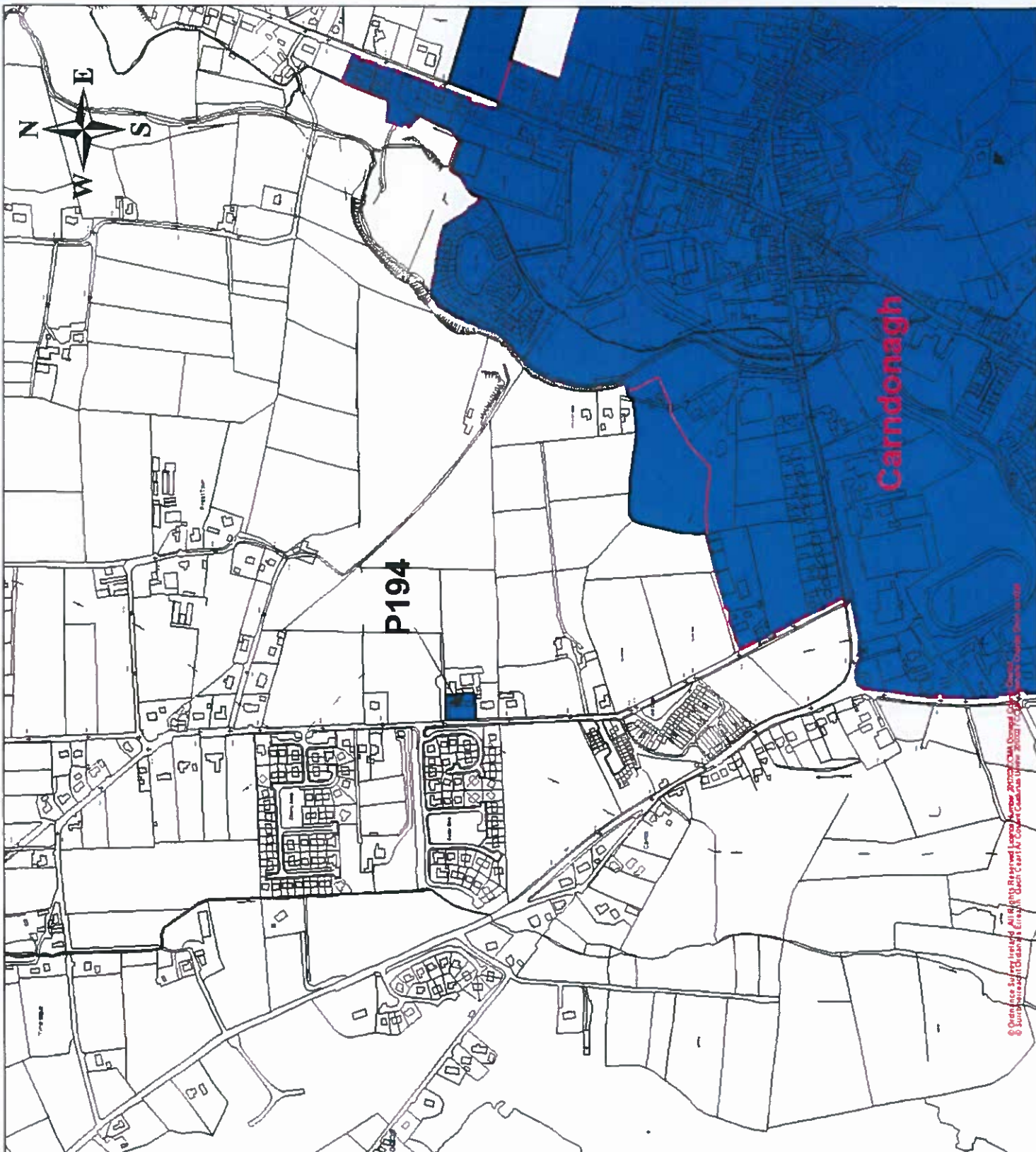
2018 - 2024
 (As required by Section
 12(4) of the Planning
 & Development Acts,
 2000 - 2017)

Map No
 Public Submission No
 Refers) P157



issue
 Inclusion of lands within the
 Settlement Envelope
 (No Map Included)

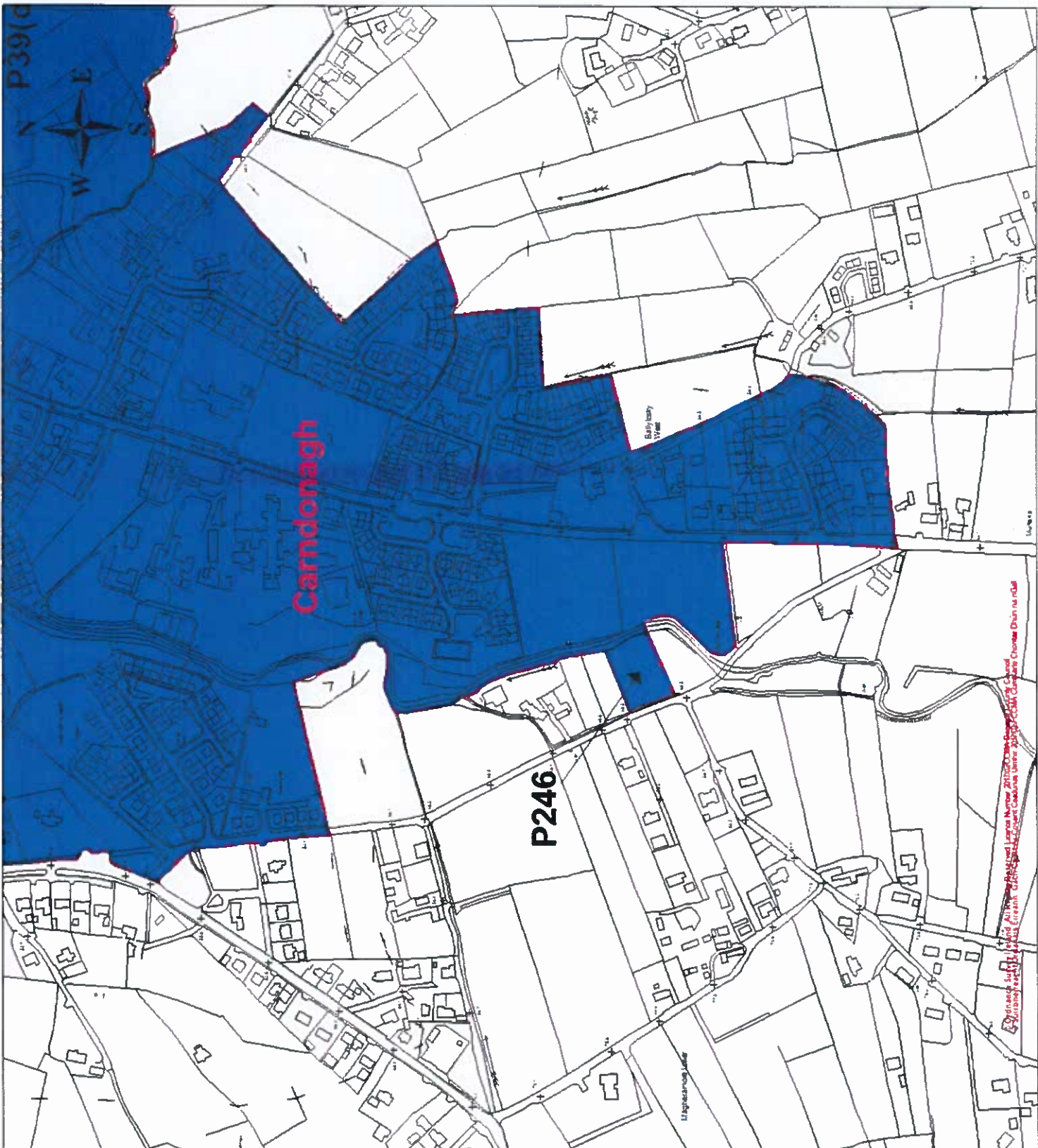
Legend


 Submissions On
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	<p>Chief Executive's Report Following the Period Of Public Consultation On the Draft County Development Plan, 2018 - 2024 (As required by Section 12(4) of the Planning & Development Acts, 2000 - 2017)</p>	<p>Map No Public Submission No Refers) P194</p>	<p>Issue Inclusion of lands within the Settlement Envelope</p>	<p>Legend</p> <p>Submissions On CDDP 2018 2024</p> 
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& Development Acts,
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Map No

**Public Submission No
Refers)
P246**

**Issue
Retain lands within the
'Settlement Envelope'**

Legend

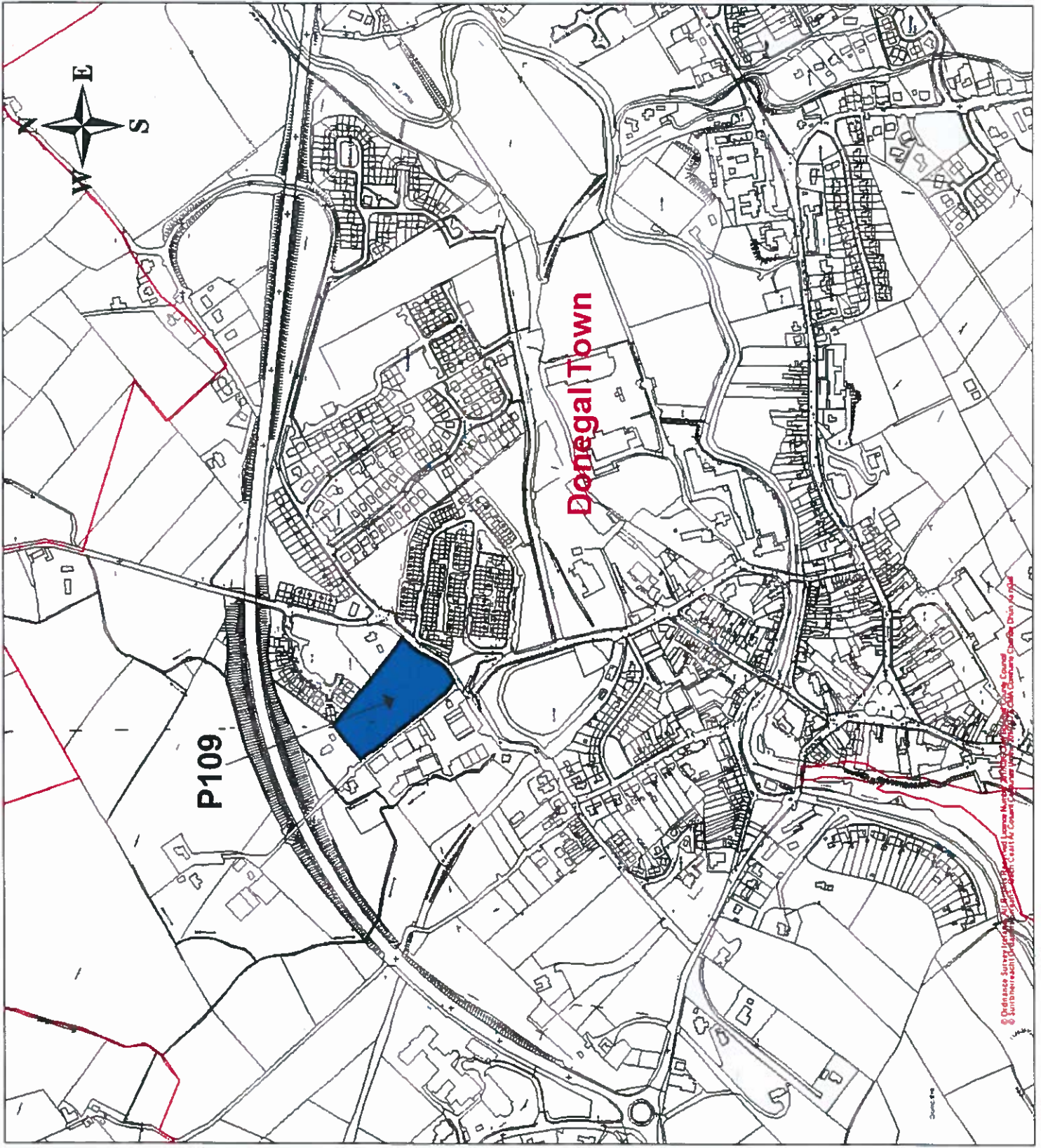
**Submissions On
CDDP 2018 2024**



4.5 Mapping of submissions in relation to Donegal Town

The following submissions are mapped in relation to specific sites located in Donegal Town:

Town	Submissions
Donegal Town	P27, P109



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12(4) of the Planning
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**Map No
Public Submission No
Refers)
P109**

**Issue
Zoning of lands to
'Residential'**

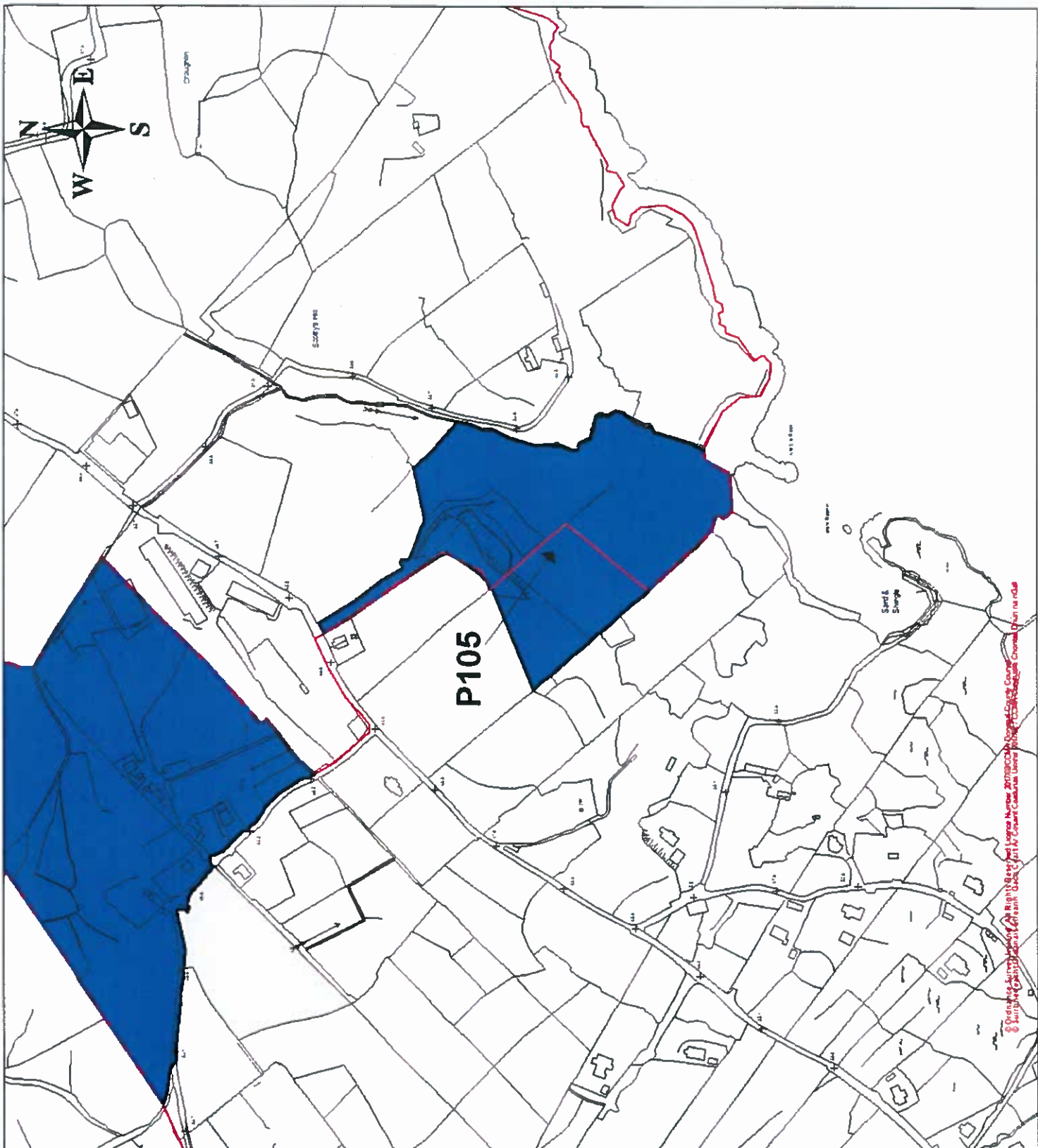
Legend
Submissions On
CDDP 2018 2024




4.6 Mapping of submissions in relation to Killybegs

The following submissions are mapped in relation to specific sites located in Killybegs:

Town	Submissions
Killybegs	P105, P273



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 & Development Acts,
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Map No
 Public Submission No
 Refers) P-105

Issue
 Re-instatement of lands previously
 zoned for tourism in the Killybegs
 LAP 2008-2014 but omitted from
 the Draft Plan Settlement Framework
 boundary.

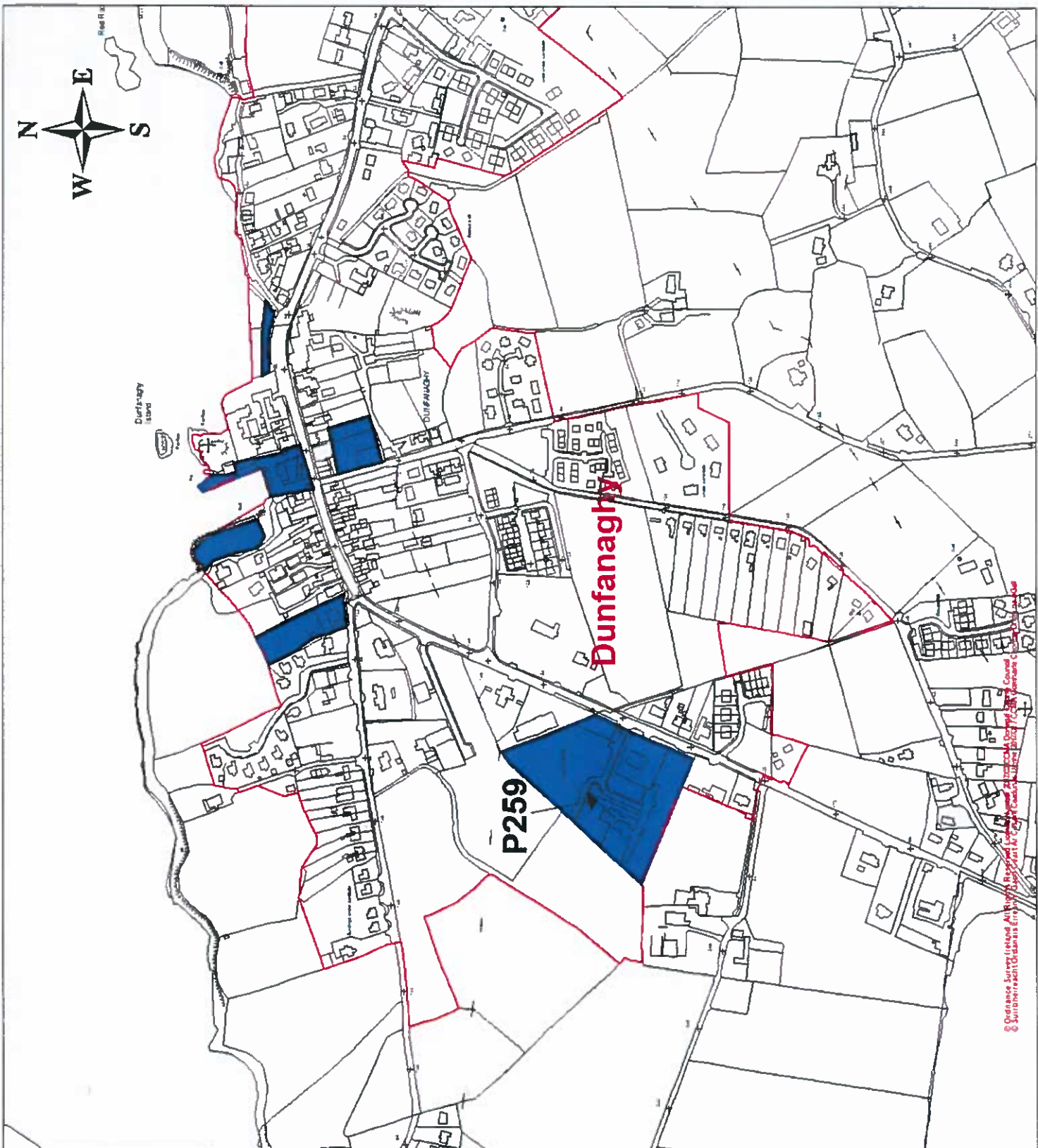
Legend

Submissions On
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4.7 Mapping of submissions in relation to Dunfanaghy

The following submissions are mapped in relation to specific sites located in Dunfanaghy:

Town	Submissions
Dunfanaghy	P189(A-E), P259



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& Development Acts,
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Map No

**Public Submission No
Refers)
P259**

Issue

**Submission relates to development
of specific site in relation to an
unfinished estate.**

Legend

**Submissions On
CDDP 2018 2024**



4.8 Mapping of submissions in relation to Glenties

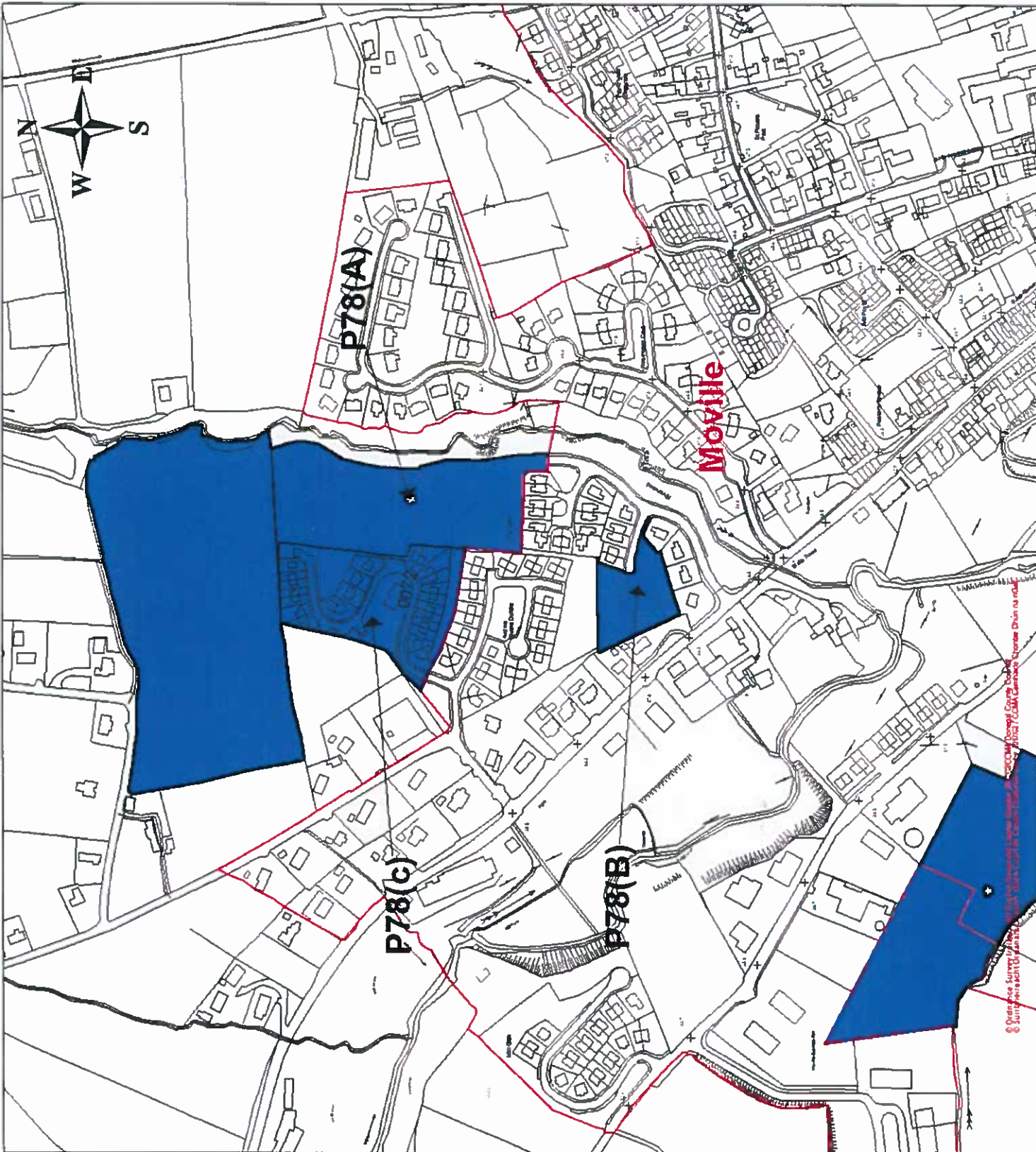
The following submission is mapped in relation to specific sites located in Glenties:

Town	Submissions
Glenties	P17

4.9 Mapping of submissions in relation to Moville

The following submissions are mapped in relation to specific sites located in Dunfanaghy:

Town	Submissions
Moville	P78(A-C), P79, P116, P236



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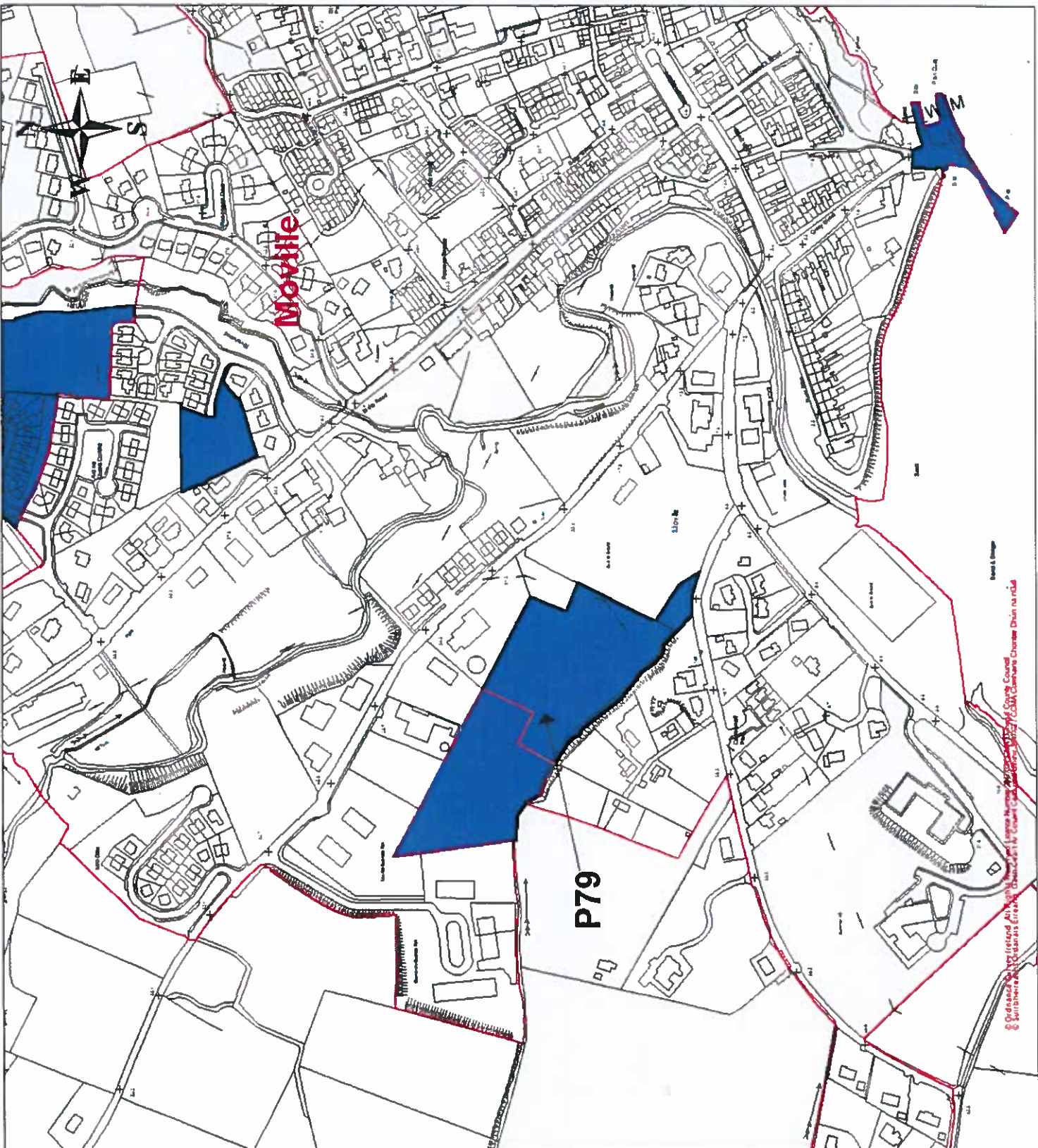
**2018 - 2024
(As required by Section
12(4) of the Planning
& Development Acts,
2000 - 2017)**


**Map No
Public Submission No
Refers)
P78(A), P78(B), P78(C)**

**Issue
Submission relates to rezoning of
lands to be included in Settlement
envelope**

Legend

 Submissions On
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12(4) of the Planning
& Development Acts,
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Map No

**Public Submission No
(Refers)
P79**


Issue

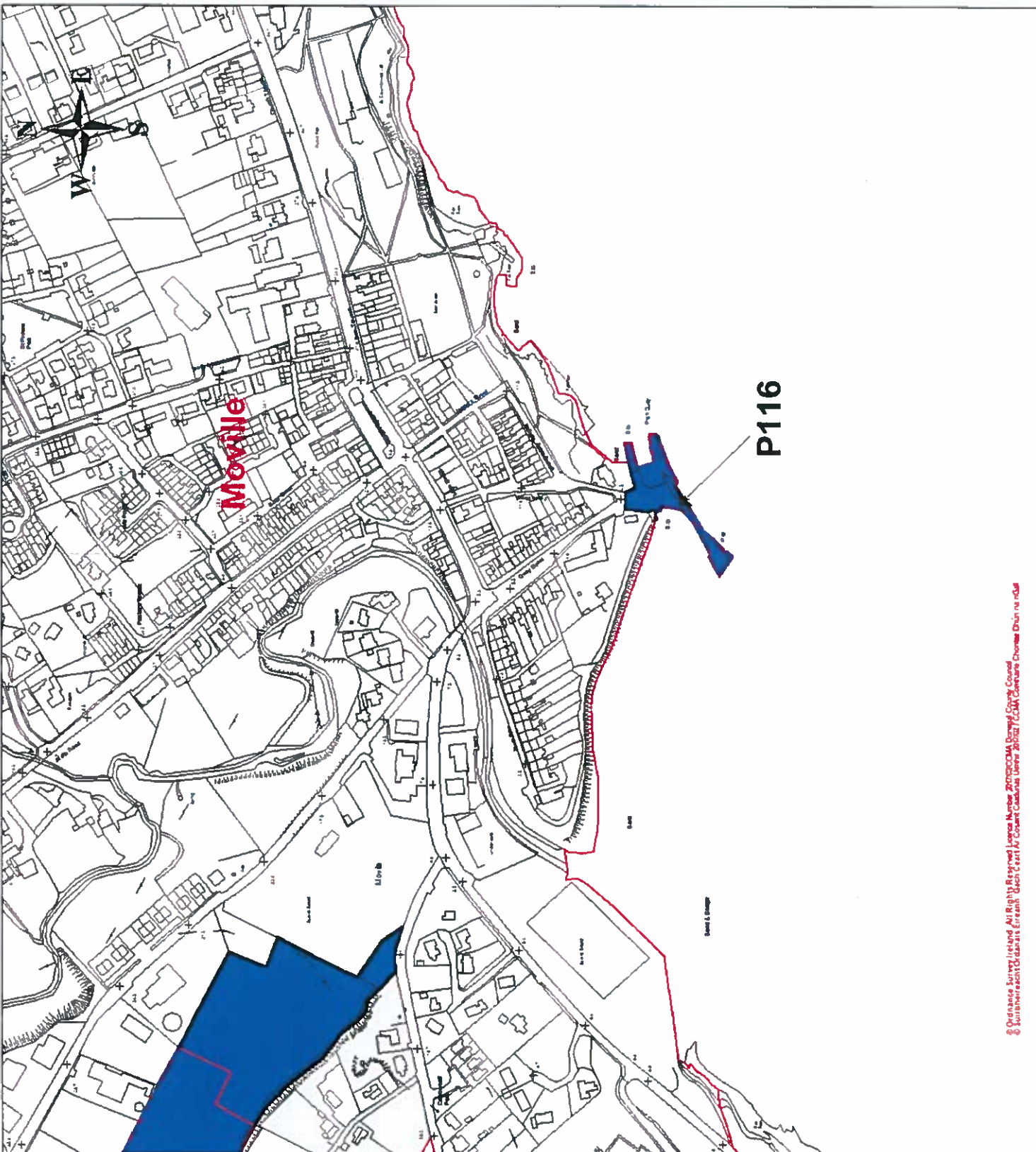
**A) Zoning of a plot already within
settlement boundary for
residential development**

**B) Inclusion of adjacent plot currently
outside of Settlement boundary to
within settlement boundary and
zoning for residential development.**

Legend

**Submissions On
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12(4) of the Planning
& Development Acts,
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Map No

**Public Submission No
Refers)
P116**

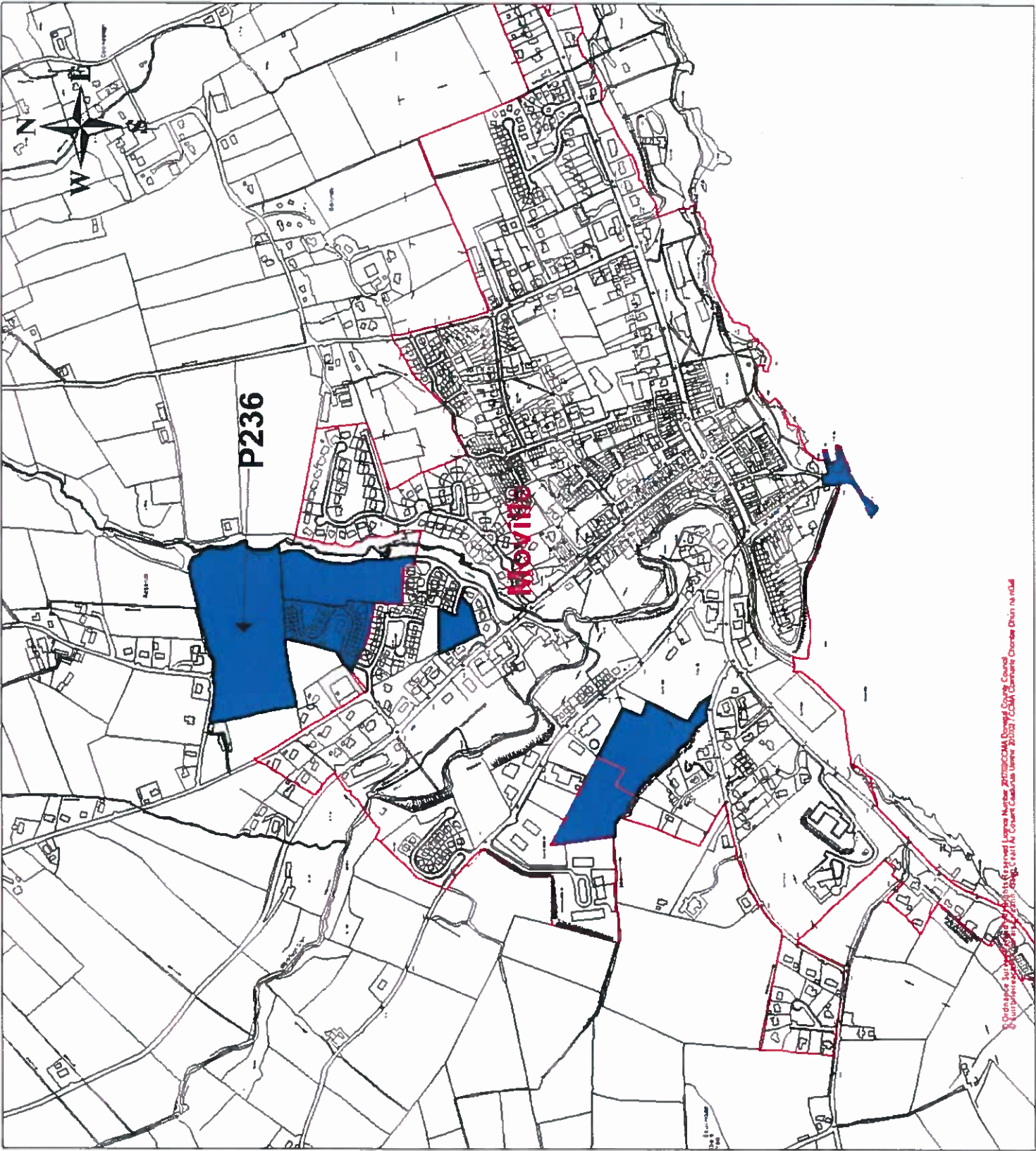
Issue

- A) Public amenity/open access status be granted to Moville Pier.**
- B) Right of Way from Bath Green to Moville Pier be 'Maintained and not obstructed.'**

Legend

**Submissions On
CDDP 2018 2024**





Ordinance Number 2018-0011 Approved August 2018
 Council Members: Mayor, Council Members: [unreadable]
 [unreadable]



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Map No

**Public Submission No
(Refers)
P236**

Issue

**Rezoning of lands outside settlement
to facilitate the development of a
nursing home and affordable housing**

Legend

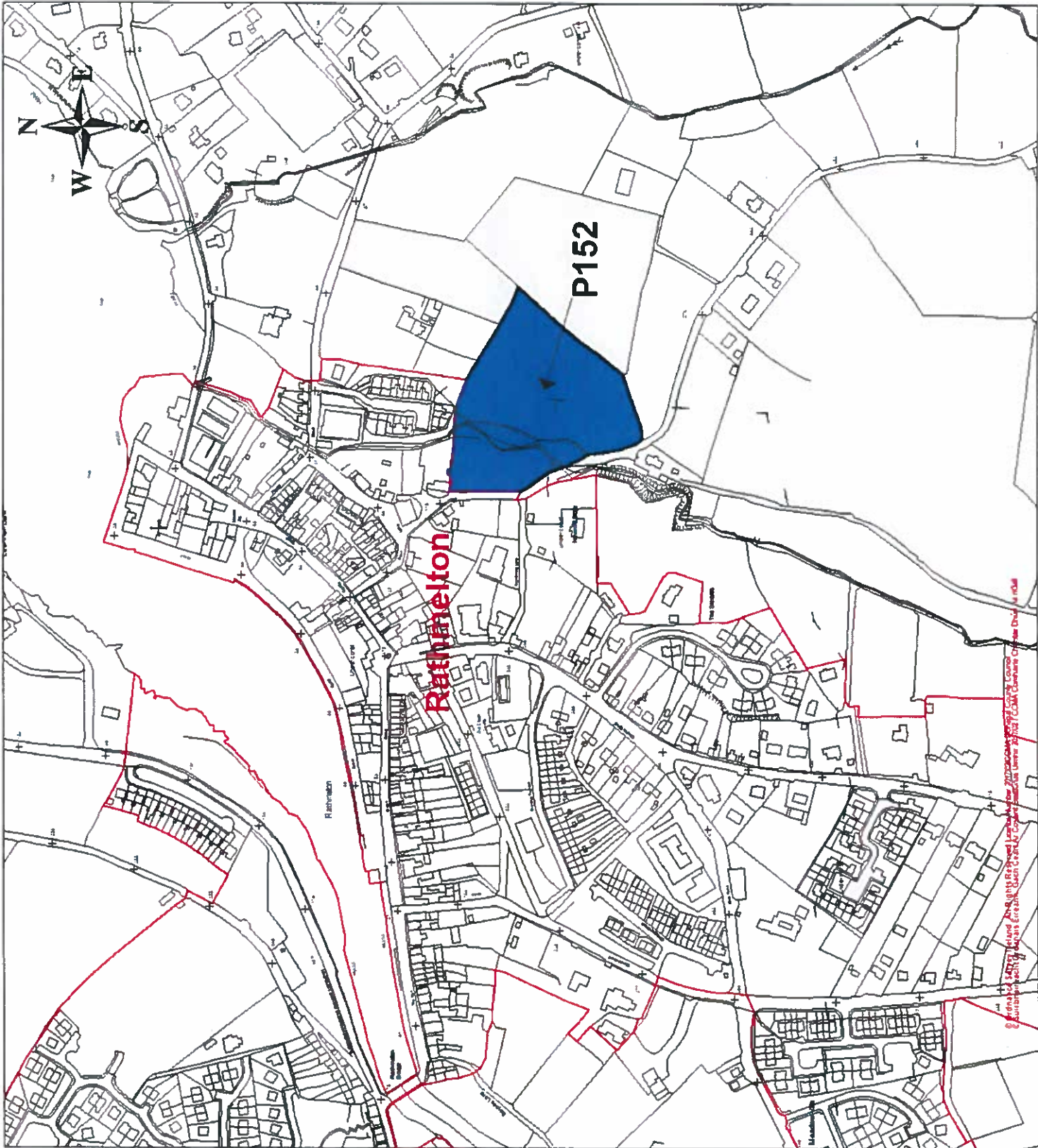
**Submissions On
CDDP 2018 2024**



4.10 Mapping of submissions in relation to Ramelton

The following submission is mapped in relation to specific sites located in Ramelton:

Town	Submissions
Ramelton	P152



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 12(4) of the Planning
 & Development Acts,
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Map No

Public Submission No
 Refers)
 P-152

Issue
 Inclusion of lands within the
 settlement boundary.

Legend

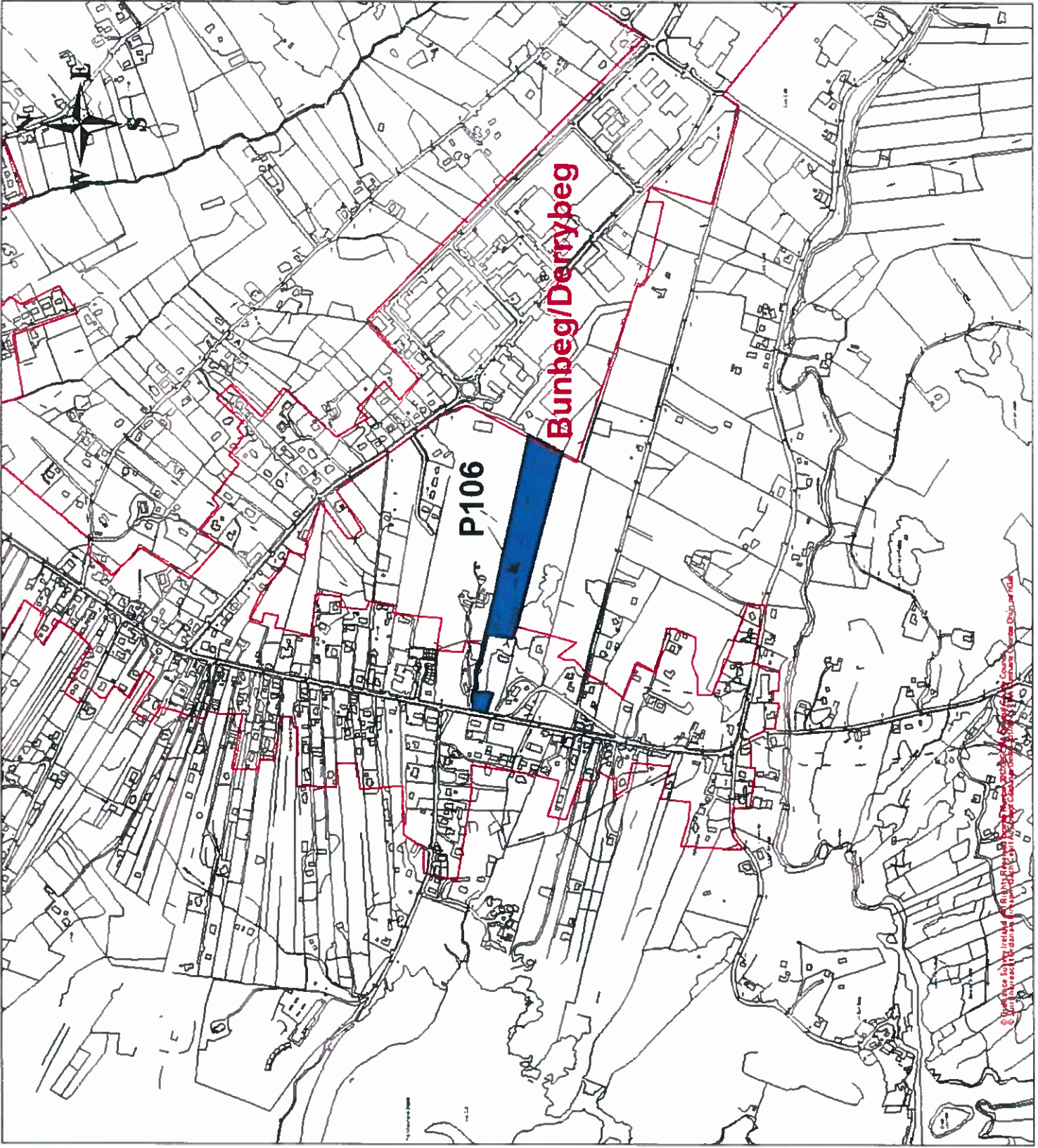
Submissions On
 CDDP 2018 2024




4.11 Mapping of submissions in relation to Layer 3

The following submissions are mapped in relation to specific sites located in layer 3:

Layer 3 locations	Submissions
Bunbeg-Derrybeg	P106
Convoy	P75
Killygordon	P195
Loughanure	P231
Manorcunningham	P57, P208
Milford	P242(A-B), P244
Mountcharles	P156
Muff	P233
Rural area at: <ul style="list-style-type: none"> ▪ Illistrin ▪ Burt ▪ Roshine ▪ Rossnowlagh ▪ Redcastle ▪ Drung ▪ Magherabeg 	P205, P66, P266, P74, P193, P206, P212, P248





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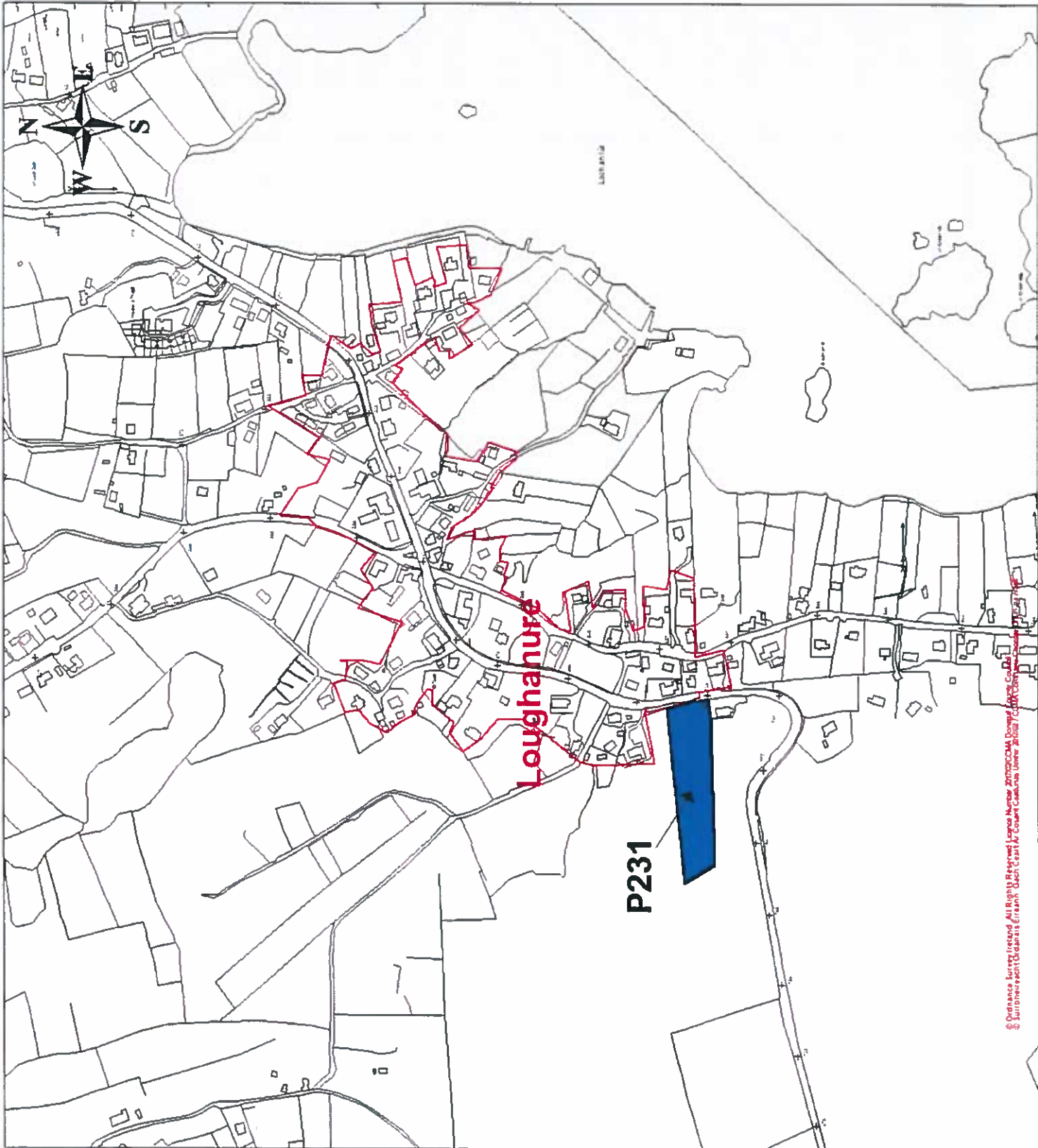
Map No

Public Submission No
Refers)
P-106


Issue
Inclusion of lands within the
settlement boundary.

Legend

Submissions On
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Map No

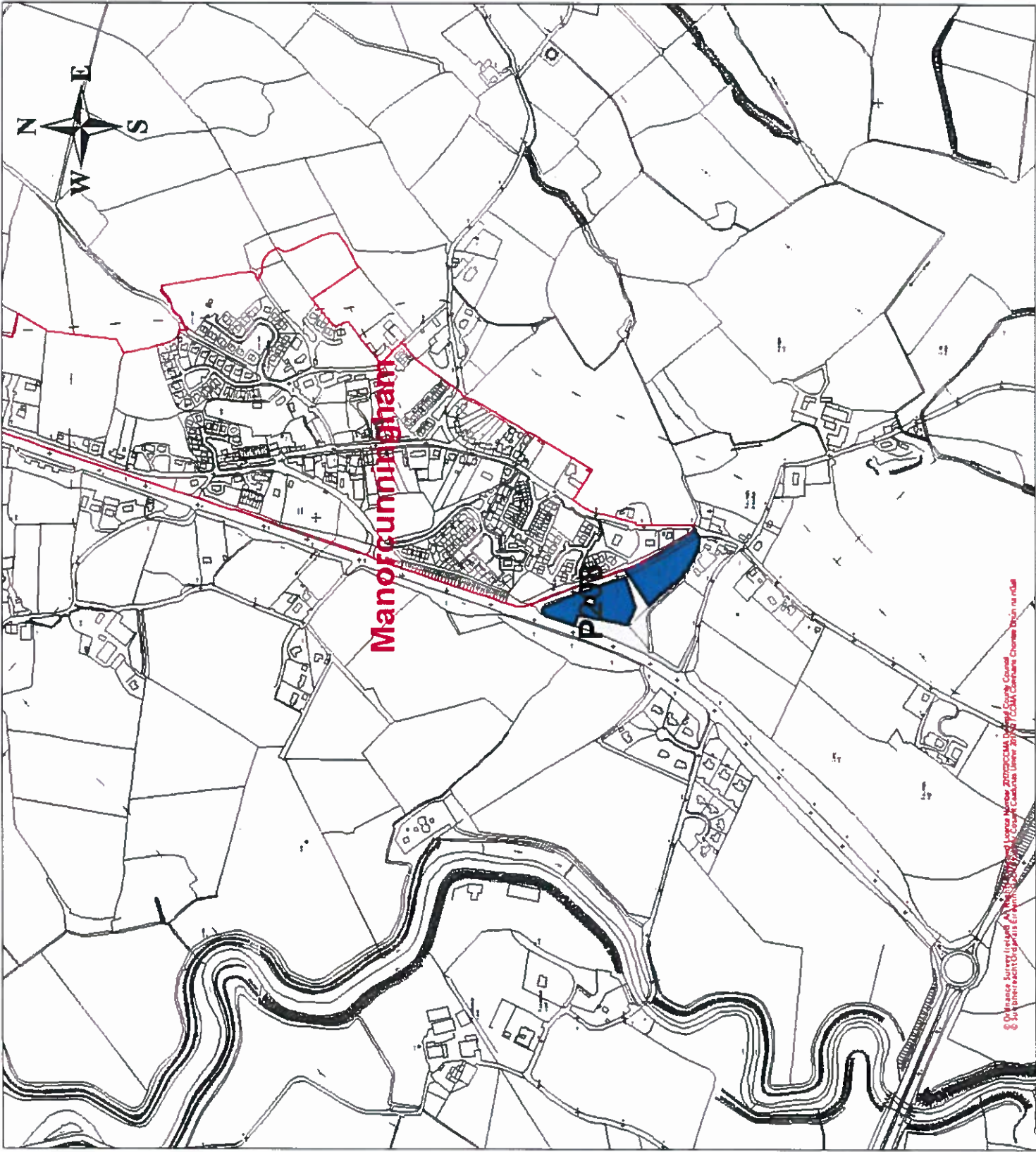
**Public Submission No
Refers)
P231**

Issue

**Inclusion of lands within the
settlement boundary and
zoning for completion of a
partially completed residential
development.**

Legend

**Submissions On
CDDP 2018 2024**



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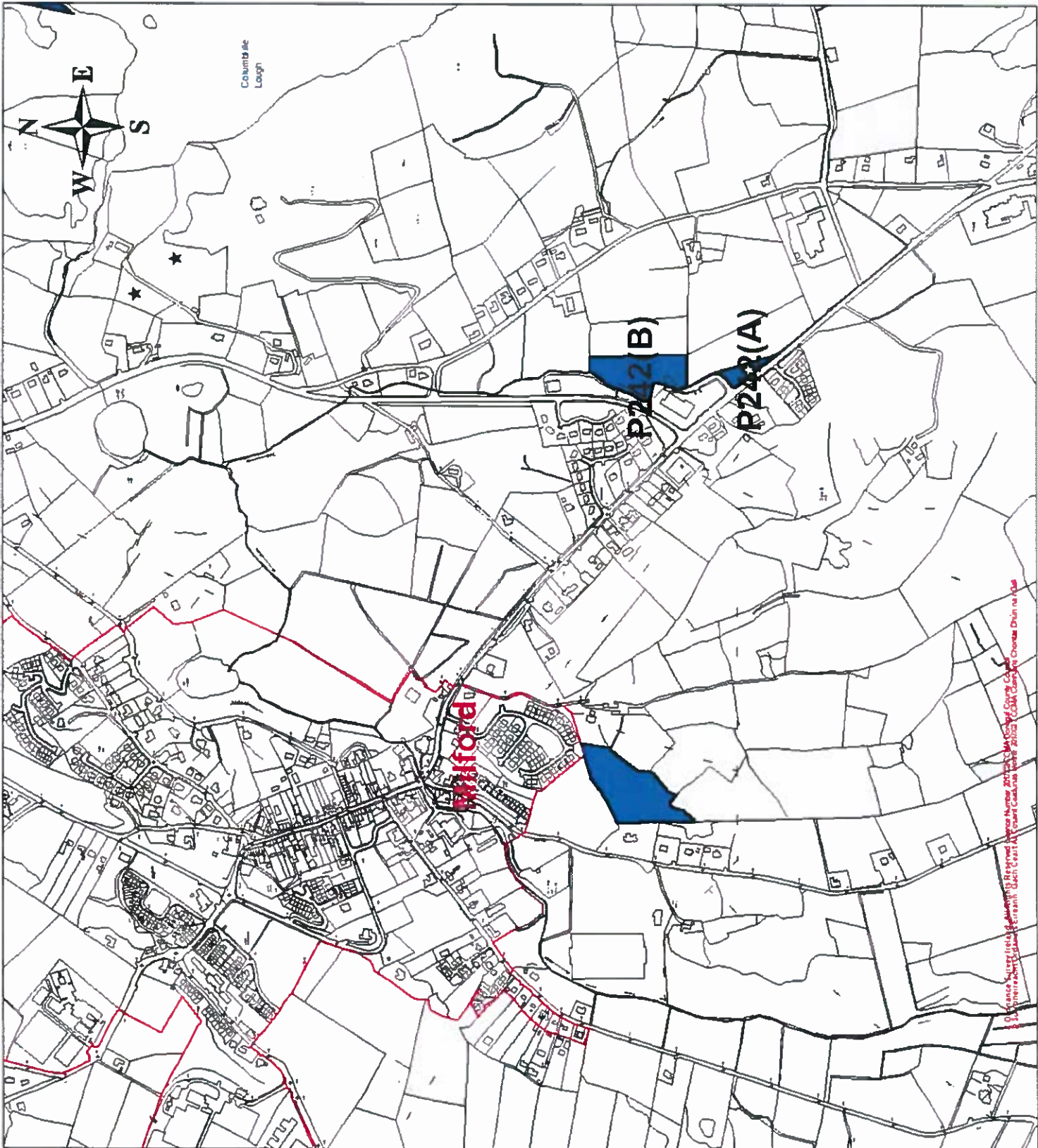
Map No

Public Submission No
 Refers) P208


issue
 Inclusion of lands within
 the settlement boundary.

Legend


 Submissions On
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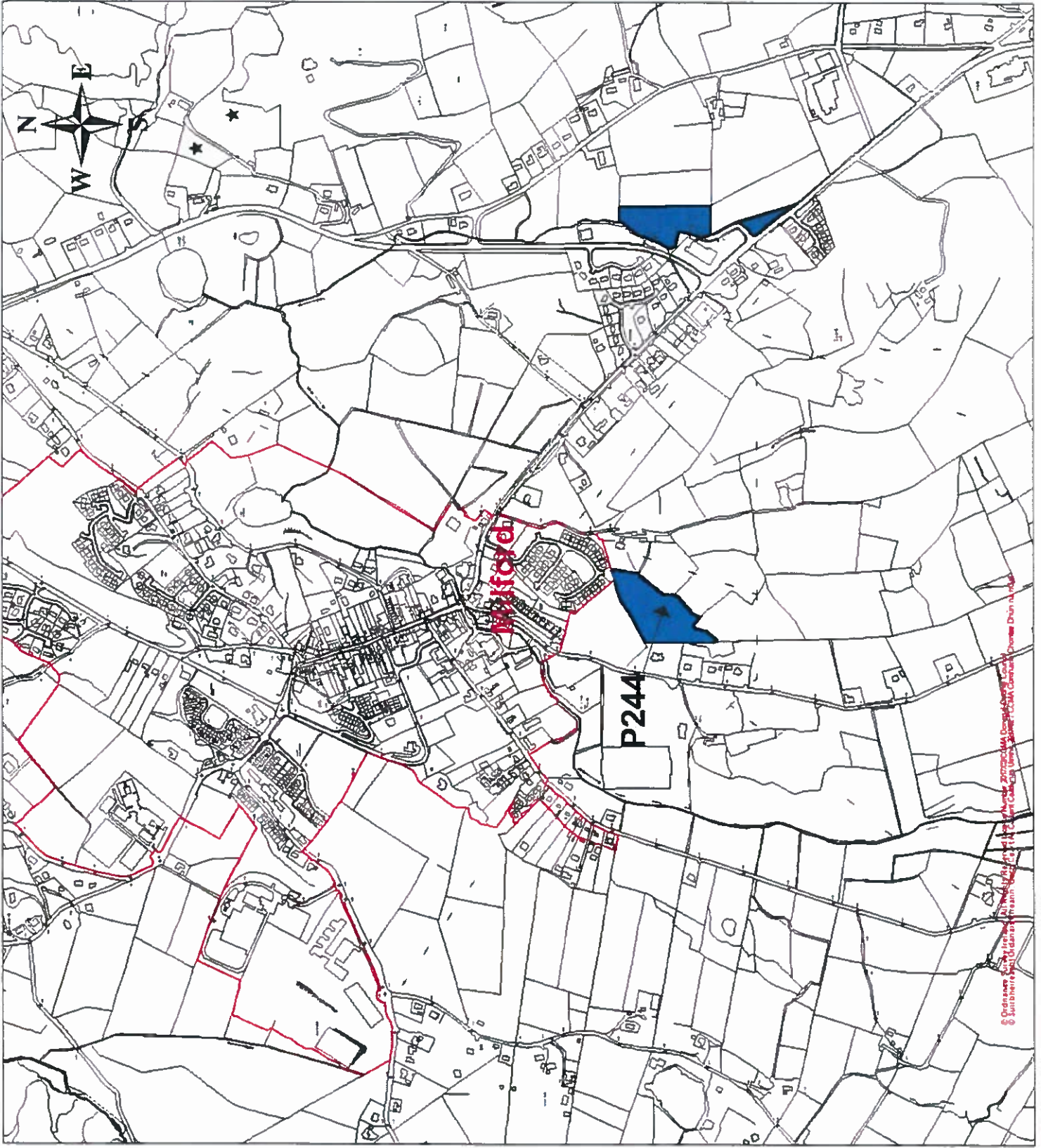
Map No

**Public Submission No
Refers)**
P242 (A-B)

Issue
**Inclusion of lands within
the settlement boundary.**

Legend

**Submissions On
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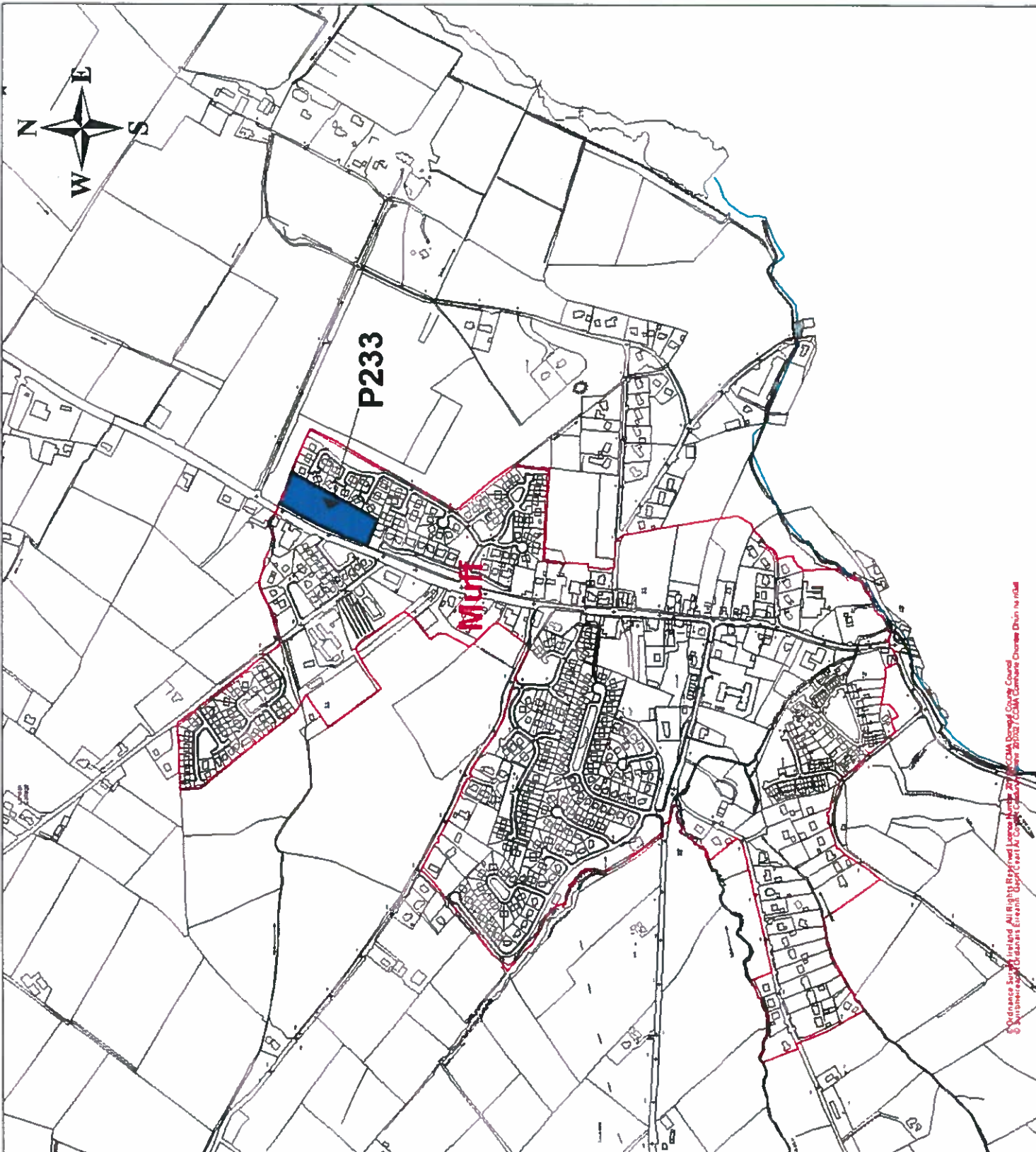
Map No

Public Submission No
 Refers)
P244

Issue
 Inclusion of lands within
 the settlement boundary.

Legend


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Map No

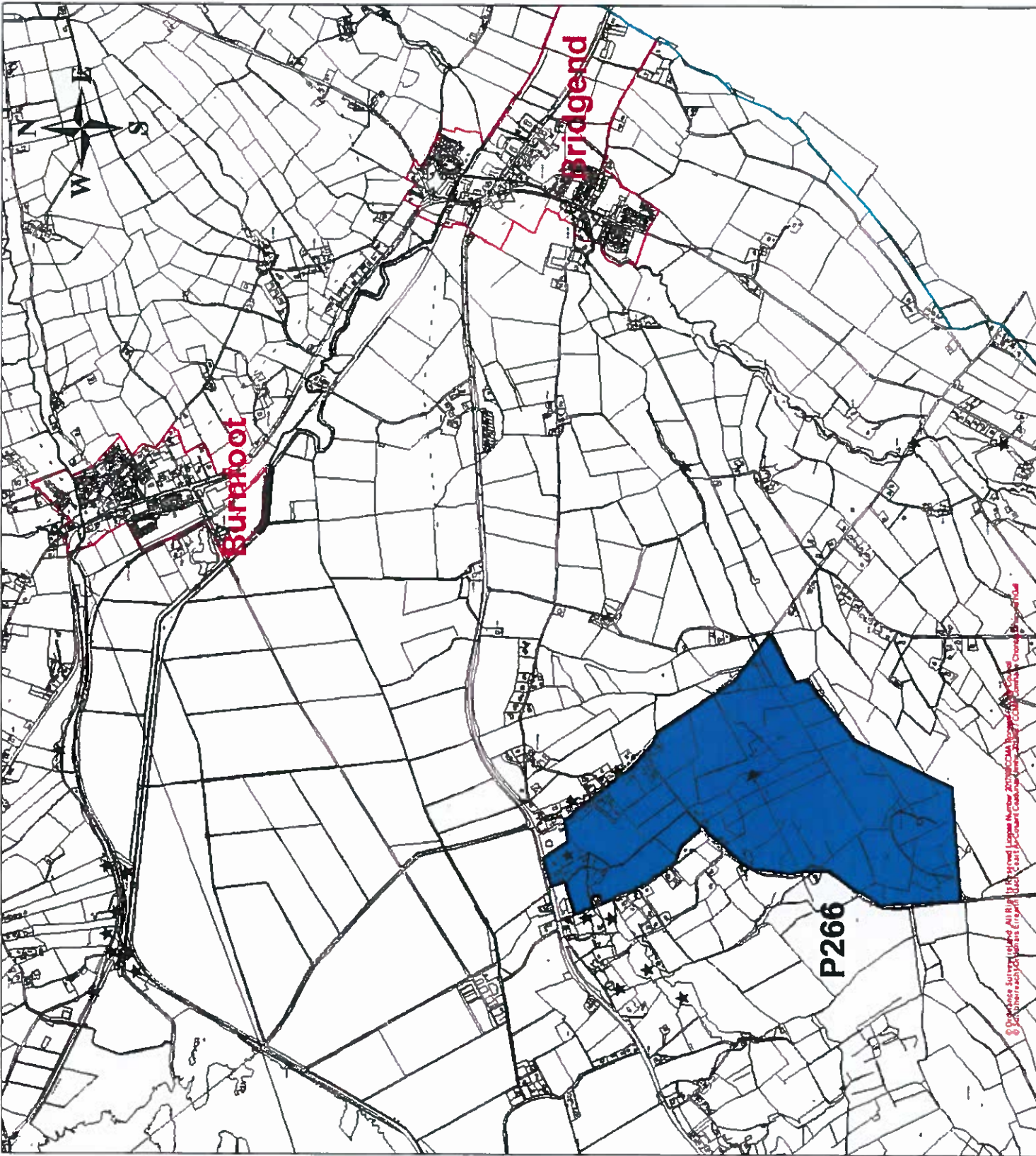
**Public Submission No
(Refers)
P233**



**Issue
Retain zoning as
'Opportunity site.'**

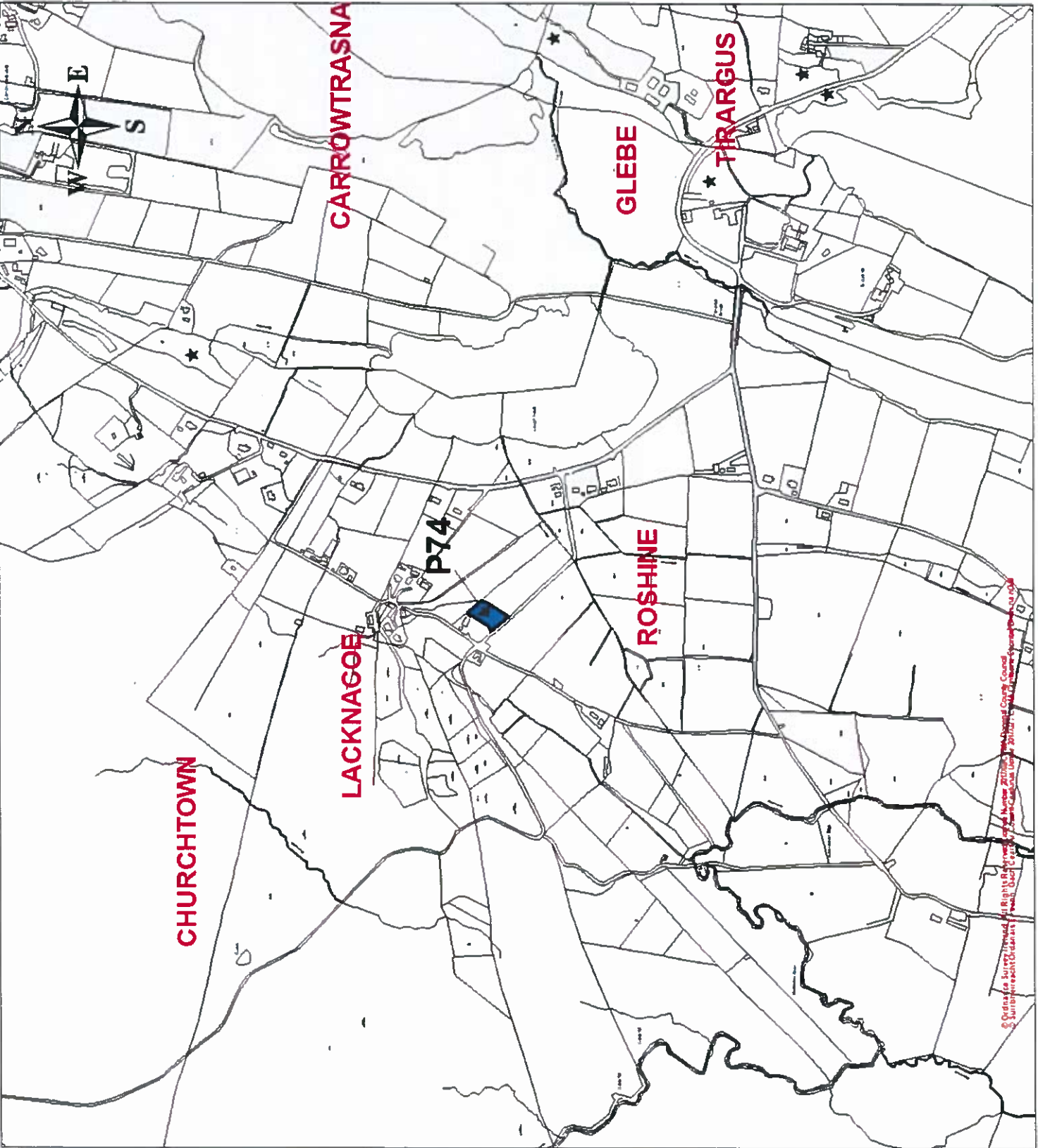
Legend

**Submissions On
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 <p>Donaghadee Coast Development Authority Donaghadee Donaghadee Coast Development Authority</p>	<p>Chief Executive's Report Following the Period Of Public Consultation On the Draft County Development Plan,</p>	<p>2018 - 2024 (As required by Section 12(4) of the Planning & Development Acts, 2000 - 2017)</p>	<p>Map No Public Submission No Refers) P266</p>	<p>Issue Area of land be designated as an area of 'Especially High Scenic Amenity'</p>	<p>Legend</p> <p> Submissions On CDDP 2018 2024</p>
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Map No

Public Submission No
Refers)
P74

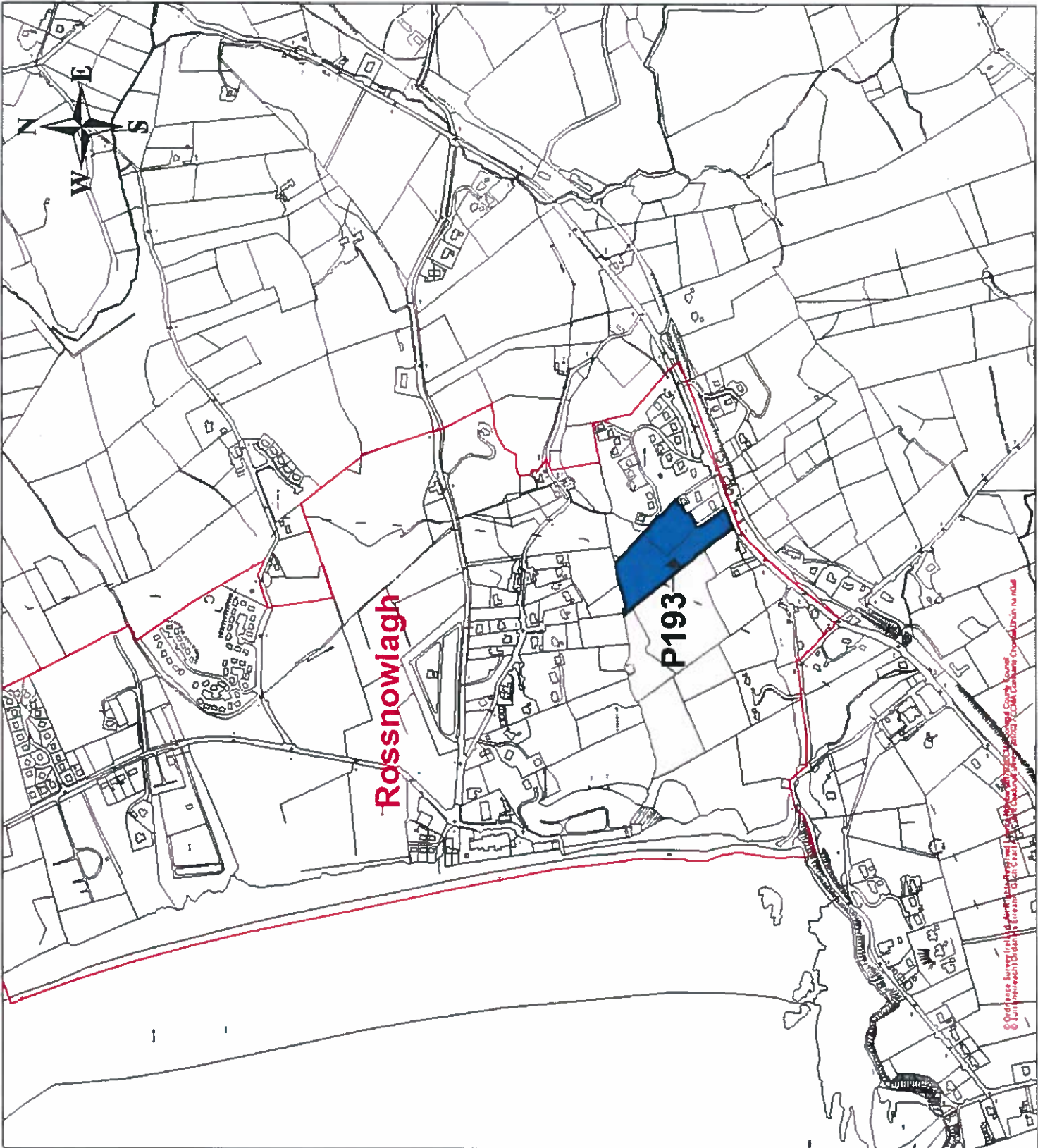
Issue

Allow development (unstated but
assumed for single house) of this
land as previously granted in
1999.

Legend

Submissions On
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Map No

**Public Submission No
Refers)
P193**

Issue

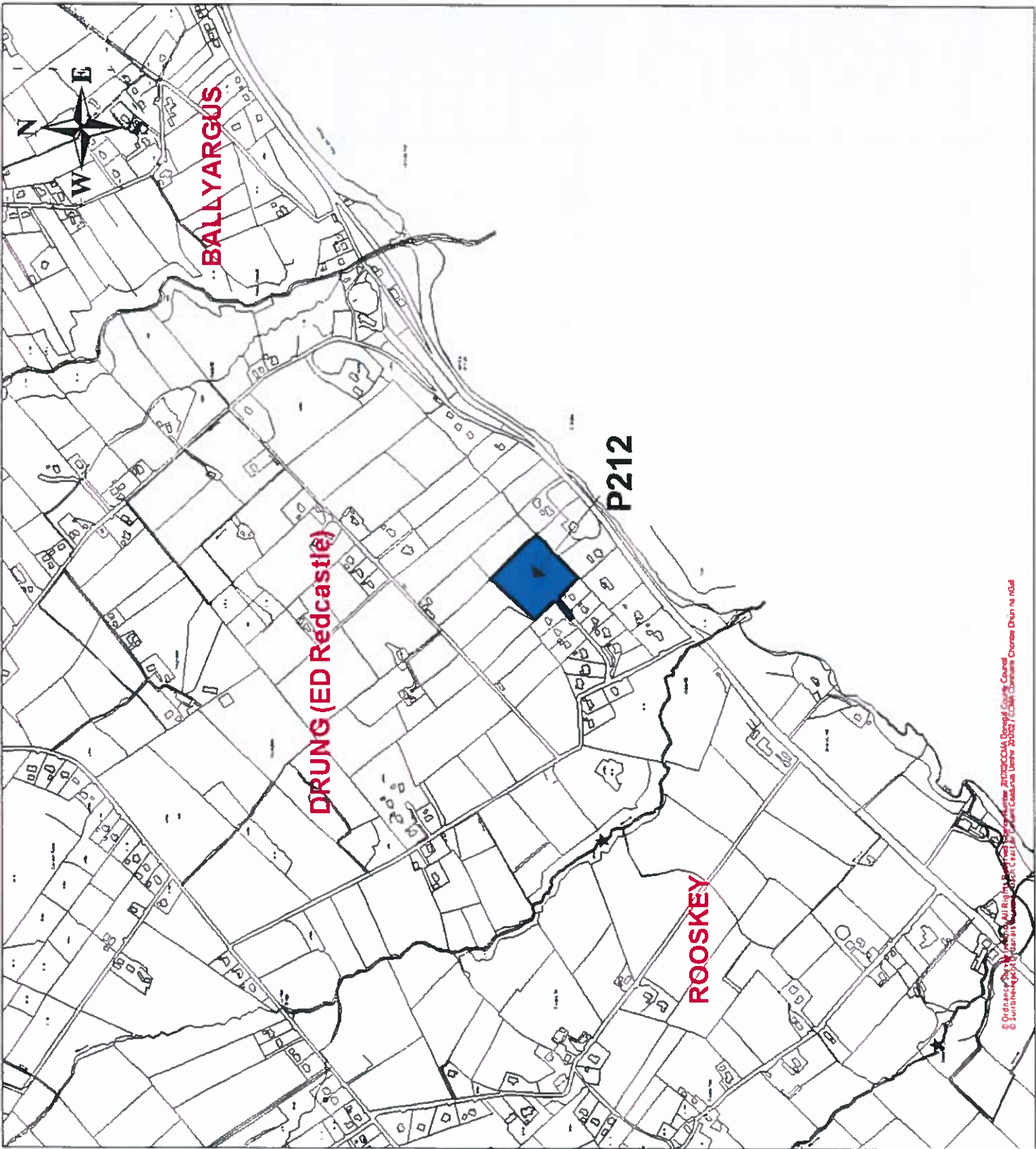
**Rezoning of lands for
'residential development'**

Legend


**Submissions On
CDDP 2018 2024**



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 & Lurgan & Rathfriland Urban Council. Ordnance Survey 2022 / CDDP. Ordnance Survey Data as of 2024



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Dhúna na nGall
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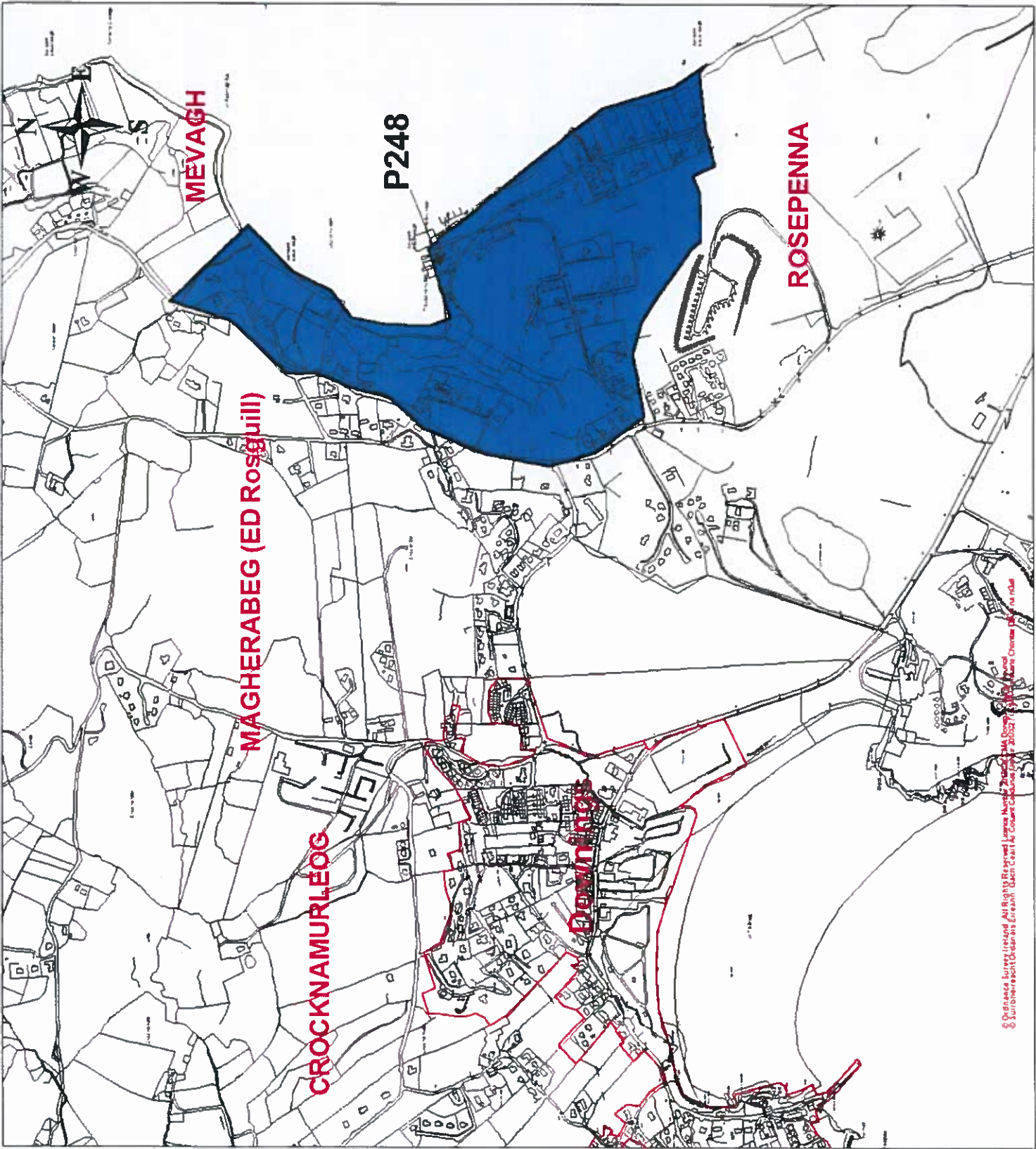
2018 - 2024
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12(4) of the Planning
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Map No
Public Submission No
Refers) P212

Issue
Submission relates to
development of specific site.

Legend

Submissions On
CDDP 2018 2024



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Map No
 Public Submission No
 Refers) P248

Issue
 Amend policy on Holiday
 Homes for a specific site.

Legend


 Submissions On
 CDDP 2018 2024

5 AO map of the site specific submissions relating to wind energy (large folded map)

The submissions that referred to specific sites in relation to wind energy are mapped on the large A0 folded map that accompanies this Appendix B.

6 AO map of the site specific submissions relating to Letterkenny (large folded map).

The submissions that referred to specific sites within Letterkenny are mapped on the large A0 folded map that accompanies this Appendix B.